

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

**North Carolina Department of Environment and Natural Resources
(NCDENR)**

27 Recommendations

Clean Air Act Recommendations

Recommendation Title: Fix AFS data discrepancies

Element: E1 Insp Universe

Finding: Data discrepancies in AFS vs. State and County data bases

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Regional Action, Local Action

Recommendation Narrative: It is recommended that the discrepancies in the universe of sources between the EPA, State and Forsyth County databases be reconciled to ensure the accuracy of data in AFS. Also, two additional discrepancies between AFS and Forsyth County's database need to be reconciled: the number of FCEs performed during FY2003 and FY2004, and the review of annual Title V compliance certifications during this time period. To ensure the completeness and accuracy of AFS data, Forsyth County should report all minimum data requirements (MDRs) for the period between FY2003 through the present, including FCEs and Title V compliance certification reviews, at a mutually agreeable date to be established with Region 4.

Recommendation Title: Ensure complete inspection reports

Element: E2 Violations ID'ed Appropriately

Finding: Incomplete inspection reports

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: The State should ensure that all inspection reports are complete and contain all the required documentation necessary to verify the compliance status of the source.

Recommendation Title: Fix FCE inconsistencies

Element: E3 Violations ID'ed Timely

Finding: Inconsistencies in FCE date and timeliness of inspection report

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Local Action

Recommendation Narrative: It is recommended that the State and Forsyth County correct the FCE date inconsistencies described in the report and that they investigate the

cause(s) behind the date errors and take corrective actions. Region 4 wants an agreement with the State and Forsyth County that results in the verification that these inconsistencies have been resolved by mutually agreeable dates to be established. Also, the State and Forsyth County are encouraged to complete all inspection reports within 30 days of completing the inspection and ensure that the FCE is reported to AFS in a timely manner.

Recommendation Title: Review and correct reporting process

Element: E6 Timely & Appropriate Actions

Finding: State is not entering NOV data into AFS in a timely manner

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: It is critical that the State issue NOV's and report them to AFS within 60 days of discovery if the current method of identifying HPVs is to comply with the Information Collection Request (ICR) deadlines. If this current method does not allow Region 4 to timely enter and manage HPV data, then it is recommended that the method of identifying HPVs be changed. The proper addressed dates should be entered for the facilities identified in Metric 6b. To conform to the HPV policy, the State needs to revise its enforcement response guideline document to include penalty assessment for all stack test failures regardless of compliance history. Region 4 and the State need to discuss this further, including a date by which the revision will be completed.

Recommendation Title: Provide penalty documentation

Element: E7 Penalty Calculations

Finding: Missing penalty documentation

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: Missing penalty documentation is a problem. The State should document the penalty calculations for all HPVs, especially for the actions where a SOC is issued. For cases where economic benefit is derived through noncompliance, the State should document the cost incurred by a facility to return to compliance and then document the results of EPAs BEN model. Region 4 and the State need to discuss this further, including a date by which the State will include complete penalty documentation (gravity and economic benefit) in all its enforcement files.

Recommendation Title: Consider and provide cost to return to compliance

Element: E7 Penalty Calculations

Finding: Cost to return to compliance missing

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: Local Action

Recommendation Narrative: In future cases when circumstances warrant, Forsyth County is encouraged to document the cost incurred by a facility to return to compliance as well as the results of EPAs BEN model.

Recommendation Title: Provide penalty calculations

Element: E8 Penalties Collected

Finding: Missing documentation of penalty calculation

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: The State should document the penalty calculations for all HPVs, especially for the actions where a SOC is issued. For cases where economic benefit is derived as the result of noncompliance, the State should document the cost incurred by a facility to return to compliance and then document the results of EPA's BEN model.

Recommendation Title: Evaluate process and implement improvements

Element: E10 Data Timely

Finding: State and local failure to meet ICR 60 day deadline

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: Both agencies are to be reminded of the deadlines in the ICR to submit all minimum data requirements within the 60 day deadline. To meet the deadline for the reporting of HPVs, the State and EPA have agreed to increase the frequency of enforcement conference calls beginning in FY2006. The Region will continue to enter all HPV data for the State as per our agreement. It is recommended that both the State and Forsyth County evaluate their reporting processes and provide Region 4 with the results at a mutually agreeable date. Furthermore, the revisions identified to improve the process should be implemented for all future MDRs reporting.

Recommendation Title: Establish recommendations and milestones to address issue

Element: E11 Data Accurate

Finding: Issues with current reporting process

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Local Action

Recommendation Narrative: Given the problems identified with data timeliness and completeness of MDR reporting, an evaluation should be conducted to assess the problems with the current reporting process. The current process used by both the State and Forsyth County need to be revised in order to ensure accurate and timely reporting of MDRs to AFS. It is also recommended that an evaluation of the accuracy of the large number of FCEs reported by the State. Region 4 needs to discuss these recommendations further with both the State and Forsyth County. During these discussions, milestones will be established.

Recommendation Title: Examine data bases to identify potential errors

Element: E12 Data Complete

Finding: The source population data in AFS is not being maintained to reflect the States' and counties' databases.

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Regional Action, Local Action

Recommendation Narrative: The source population data in AFS should be maintained to reflect the States and county's databases. Efforts should be made to reconcile the source population data, especially for Forsyth County. Priority should be given to reconciling the universe of SM-80 facilities in the county. Region 4 plans to follow-up with both agencies in early FY2007 to ensure the accuracy of the source population data. Once this task is complete, the other MDR elements should be reconciled. As previously recommended in Metric 3, Forsyth County should investigate the cause(s) behind the date errors and take corrective actions. The difference of 280 facilities in violation discrepancy in the Historic Noncompliance Counts section is a potentially serious problem. While Region 4 thinks this significant difference between AFS and the States database could be related solely to non-federally reportable and State-only violations, a sample of this data needs to be examined jointly by Region 4 and the State to determine if a significant data quality issue exists.

Clean Water Act Recommendations

Recommendation Title: Update stormwater inspection form

Element: E2 Violations ID'ed Appropriately

Finding: Quality of inspection report needs improvement

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: NPDES Stormwater - The stormwater inspection form should be updated to incorporate more detail for the on-site inspection. Observations should be documented so that inspection finding, and ultimately, violation identification can be clearly concluded. The Region is available to provide assistance to the State to improve the quality of inspection reports/checklists.

Recommendation Title: Ensure appropriate single event reporting

Element: E4 SNC Accuracy

Finding: Inconsistent reporting of single -events

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: It is recommended that North Carolina begin consistently reporting single-event violations arising from major facility compliance monitoring. North Carolina should periodically perform quality assurance checks to ensure accurate and timely data entry. EPA will begin pulling SEV data from PCS starting in FY2007 to ensure that data has begun to flow into the national system of record.

Recommendation Title: More formal enforcement may be appropriate

Element: E5 Return to Compliance

Finding: State needs to do a better job addressing chronic violators

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: EPA recommends for NPDES conventional facilities that in cases where a facility exhibits chronic effluent violations, a return to compliance date should be specified in the order as part of the enforcement escalation process. SOCs may be an appropriate course of action when a facility is unable to consistently comply with the terms, conditions or limitations or their permit due to tangible problems (i.e., plant design or infrastructure).

Recommendation Title: Efforts need to be made to correct data entry issues

Element: E6 Timely & Appropriate Actions

Finding: Significant data entry issues

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: General - The North Carolina Division of Water Quality has experienced data entry issues due to problems with the BIMS/PCS interface. Efforts to address and correct interface issues should continue and be discussed on a regular basis during the quarterly Pacesetter calls. Currently, EPA Region 4 and North Carolina have been using the Watch List as an effective tool in identifying NPDES major facilities with recurring effluent limit violations. Region 4 states are currently reporting all Watch List water criteria, including four pilot criteria. North Carolina would like EPA to finalize the pilot criteria and recommends that some of the pilot criteria (2d1 - 200% exceedance and 2d2 - pH extremes) be removed since they do not generally warrant a state action based on one time events. North Carolina is encouraged to continue to utilize the Watch List as an enforcement tool and to address violations with timely and appropriate actions.

Recommendation Title: The State should document the economic benefit and gravity contributions for all penalties assessed.

Element: E7 Penalty Calculations

Finding: The States penalty policy and its strategy for taking formal enforcement for repeat violators are not clear.

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: NPDES Conventional Facilities - The States penalty policy and its strategy for taking formal enforcement for repeat violators are not clear. State guidance of penalty ranges for various violations should continue to be relied upon and documented in the central files. Although both gravity and economic benefit are components of the eight assessment factors and are taken into consideration when assessing civil penalties, North Carolina should document the economic benefit and gravity contributions for all penalties assessed. General – The penalty worksheet is an

appropriate and adequate mechanism to document the contribution of gravity and economic benefit, however, not all of the enforcement files reviewed had the penalty worksheet included. It is recommended that the penalty rationale be kept in the enforcement file and available for review at all times. If North Carolina determines that an action does not warrant a penalty, documentation of the decision and rationale for the decision should be included in the case file. Furthermore, it is recommended that NCDENR develop a check list to be included in the files, especially for the FastTrack cases, so that case managers and reviewers can assure that all elements that should be in the enforcement case file are present.

Recommendation Title: The State should develop criteria and a work sheet to document the penalties and reductions.

Element: E8 Penalties Collected

Finding: Missing penalty calculation

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: Although both gravity and economic benefit are components of the eight assessment factors and should be taken into consideration when assessing civil penalties this information was not available in the documentation. North Carolina should document the economic benefit and gravity contributions for all penalties assessed and collected. The files reviewed did not have a written basis for the final penalty. NCDENR should develop criteria and a work sheet to document the penalties and reductions. It is recommended that the penalty rationale be kept in the enforcement file and available for review at all times. If North Carolina determines that an action does not warrant a penalty, documentation of the decision and rationale for the decision should be included in the case file.

Recommendation Title: Grant requirement to provide necessary data

Element: E9 Grant Commitments

Finding: Lack of complete documentation

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Regional Action

Recommendation Narrative: It is recommended that a requirement be entered into the EPA/NC CWA106 Program Workplan to enter missing data on NOVs, penalty assessments, and penalty orders into PCS. Furthermore, it is recommended that the Majors/Minors Storm Water Compliance Enforcement Strategy is put into final form, or that the State has a current schedule and action plan if the document has not been completed.

Recommendation Title: The State should increase the frequency of QA/QC data checks until the problem has been resolved.

Element: E10 Data Timely

Finding: Data uploading problems

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: North Carolina has experienced interface problems with the State database, BIMS, and PCS. North Carolina is aware of this ongoing issue. Correction of the interface difficulties has been a continual work in progress and the State has resolved many of the problems to date. North Carolina should continue to utilize current standard operating procedures, or update them as necessary, for entering all required data into PCS in both a timely and accurate manner as outlined in the programs 106 workplan. North Carolina should increase the frequency of QA/QC data checks until the problem has been resolved. EPA PCS data staff is available to assist NC, as needed, to help correct the database interface issues.

Recommendation Title: The State should immediately input missing data into PCS

Element: E11 Data Accurate

Finding: The State has data entry issues

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: North Carolina should review their process for entering all data to ensure consistency with their SOP. North Carolina should utilize the current standard operating procedure, or update it as necessary, for entering all required data into PCS both timely and accurately. North Carolina should immediately input missing data into PCS.

Recommendation Title: Increase QA/QC of data

Element: E12 Data Complete

Finding: State has missing data in PCS

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: North Carolina is should continue with their efforts to enter all required data into PCS in both a timely and accurate manner. North Carolina should increase the frequency of QA/QC data checks to ensure that they are meeting the national goal for the entry standard for majors.

Resource Conservation and Recovery Act Recommendations

Recommendation Title: CME/OAMs should still be conducted at new LDFs until an adequate system is in place

Element: E1 Insp Universe

Finding: State is not conducting all CME/OAMs new LDFs

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action, Regional Action

Recommendation Narrative: With the exception of those facilities still requiring CMEs/OAMs as described in OECA Guidance, it is recommended that NCDENR record the evaluation of the groundwater monitoring reports into RCRAInfo. Although OECA does not provide specific guidance on this, it is recommended that the groundwater monitoring reports be entered as non-financial record reviews (RCRAInfo evaluation code NRR) on an annual basis, at a minimum. Region 4 will seek further clarification on this topic in the revision of the upcoming guidance for FY2007, and will notify NCDENR of any modifications.

Recommendation Title: Review record management practices

Element: E2 Violations ID'ed Appropriately

Finding: Difficulty in locating some inspection records

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: NCDENR should review the record management practices for enforcement and compliance files to ensure records are properly maintained.

Recommendation Title: Review data entry procedure

Element: E4 SNC Accuracy

Finding: Not all data entered into data base timely

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: An essential part of quality RCRA enforcement program is assuring that all information is promptly and correctly entered into RCRAInfo. Although the violation determinations are being made in accordance with the RCRA ERP, this is not always reflected by timely data entry. EPA recommends that NCDENR review the procedures for entering inspection and enforcement information into RCRAInfo

Recommendation Title: Records of enforcement proceedings and return to compliance be maintained

Element: E5 Return to Compliance

Finding: Documentation recording activities subsequent to enforcement were often missing from the files

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: It is recommended that the State ensures that records of enforcement proceedings and return to compliance are maintained in the files.

Recommendation Title: Lack of economic benefit documentation

Element: E7 Penalty Calculations

Finding: Economic benefit determination missing

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: EPA recommends that NCDENR revise the penalty calculation worksheets to document that economic benefit has been considered in assessing the penalty.

Recommendation Title: Provide final penalty information

Element: E8 Penalties Collected

Finding: Final penalty documentation missing

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: NCDENR should consider options to maintain final penalty documentation, including economic benefit and gravity-based calculations.

Recommendation Title: Review data entry procedure

Element: E10 Data Timely

Finding: Data entry not timely

Status: Completed

Expected Completion Date: 03/05/2007

Responsible Agency: State Action

Recommendation Narrative: The State should review the procedures for entering inspection and enforcement information into RCRAInfo modifying them as needed to ensure timely data entry.

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
AHERA – 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
BIMS – BasinWide Information Management system
BMP – Best Management Practices
BoP – Bureau of Prisons
BEN - Economic Benefits of Noncompliance

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
ICR – Information Collection Request
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

Q

QA/QC – Quality Assurance and Quality Control

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
SM – Synthetic Minors
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