

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

New Hampshire Department of Environmental Services (NHDES)

37 Recommendations

Clean Air Act Recommendations

Recommendation Title: Enforcement history needed in Inspection Reports

Element: E2 Violations ID'ed Appropriately

Finding: Inspection reports missing past enforcement history

Status: Completed

Expected Completion Date: 10/01/2005

Responsible Agency: State Action

Recommendation Narrative: Ensure that all inspection reports include a “past enforcement history” section that details any past air enforcement at the source or states “none” if there has been no such enforcement.

Recommendation Title: Inspection Reports

Element: E2 Violations ID'ed Appropriately

Finding: Inspection reports are not always complete.

Status: Completed

Expected Completion Date: 03/31/2008

Responsible Agency: Regional Action

Recommendation Narrative: Region 1 should develop an SOP and a system to track the process for conducting inspections, completing inspection reports, and documenting determinations of violations. It is important to identify SNCs and SEVs as quickly as possible in order to adhere to the timeliness criteria for issuing enforcement actions. Inspection reports need to be complete enough to determine what was inspected and what was found. In the long run, the files should contain the historic record of the facility to ensure that future inspectors can easily find inspection reports, notes to the file and other files information. This will help inspectors to understand the compliance history of a facility.

Recommendation Title: Filing System

Element: E3 Violations ID'ed Timely

Finding: Enforcement and compliance files were in different places and difficult to locate.

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: Regional Action

Recommendation Narrative: Region 1 should develop a plan for organizing and maintaining the historical compliance and enforcement files to ensure that they have the

requisite documentation so files contain historical records for a facility and that Regional inspectors and managers have ready access to these materials.

Recommendation Title: Timeliness

Element: E3 Violations ID'ed Timely

Finding: Untimely inspection reports

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: Regional Action

Recommendation Narrative: For those inspections reports that took more than 30 days, especially the one that took 98 days, the Region should examine the reasons for why it took so long to write a final report and prepare a plan for avoiding unduly long delays.

Recommendation Title: Timely completion of Inspection Reports

Element: E3 Violations ID'ed Timely

Finding: Inspection Reports Not Timely

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: Ensure that inspection reports are completed and finalized in a timely manner

Recommendation Title: Consistently set "Day Zero"

Element: E4 SNC Accuracy

Finding: Variation is setting Day Zero for HPVs

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: Once a violation has been found (often by the inspector) a prompt referral should be made to the enforcement group. The enforcement group should promptly make a determination as to whether the facility is an HPV. Deadlines for internal hand-offs within DES are up to DES. However, the HPV day zero (which is the day DES determined that the violation makes the source an HPV) must be within 45 days of the realization that there was some violation. Often this realization occurs at an inspection, which would mean that the HPV determination would have to be made within 45 days of the inspection.¹ If the next EPA quarterly meeting is more than one month away, DES should e-mail or call its EPA Region 1 liaison to report the HPV.

Recommendation Title: Complete HPV actions with in 270 day

Element: E6 Timely & Appropriate Actions

Finding: Complete HPV actions with in 270 days

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: Where practical, while still bringing sources into compliance with emission limits and testing/monitoring requirements as quickly as

possible, focus on completing HPV formal enforcement actions within 270 days of the day zero.

Recommendation Title: Improve Economic Benefit Calculations and documentation

Element: E7 Penalty Calculations

Finding: Calculation and documentation of economic benefit needs improvement

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: Incorporate consideration and calculation of economic benefit into the standard operating procedures for penalty calculations. Where there is no economic benefit to collect, clearly document this determination in the file.

Recommendation Title: Improve timeliness in entering Day Zero

Element: E10 Data Timely

Finding: Data accuracy relating to HPV and Day Zero needs improvement

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: If no meeting with EPA is scheduled to occur within 30 days of HPV identification (i.e., within 30 days of day zero), email the HPV data information sheet to the EPA Region 1 air enforcement liaison for DES so that the HPV data may be entered into AFS in a timely manner. As part of the PPA process, EPA has recommended that the 3 sections of the NH PPA that relate to HPV identification, addressing actions, and resolution should be amended to add: “DES will [identify / address / resolve] HPVs in accordance with EPA's Timely and Appropriate Enforcement Response to High Priority Violators (“the HPV policy”), July 1999. DES will inform the EPA Region 1 liaison in person, by phone, or by email within 45 days of [identifying / addressing / resolving] an HPV.”

Recommendation Title: Improve HPV data entry

Element: E11 Data Accurate

Finding: HPV's need to be entered accurately in AFS

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: When DES notifies EPA of a new HPV, DES should simultaneously change the compliance status of that facility in AFS to “in violation.” When DES notifies EPA that an existing HPV pathway has been resolved, DES should simultaneously change the compliance status of that facility in AFS to “in compliance.”

Clean Water Act Recommendations

Recommendation Title: SNC identification/Data accuracy

Element: E3 Violations ID'ed Timely, E4 SNC Accuracy

Finding: Single Event Violations are not being entered into the data system.

Status: Completed

Expected Completion Date: 03/31/2008

Responsible Agency: Regional Action

Recommendation Narrative: The Region needs to begin reporting single event violations into ICIS-NPDES as soon as possible. Also, the Region needs to use CEIs to identify SNC when appropriate.

Recommendation Title: Data Quality

Element: E4 SNC Accuracy

Finding: CSO-SSO data are being entered into the national data system.

Status: Completed

Expected Completion Date: 10/01/2007

Responsible Agency: Regional Action

Recommendation Narrative: Information currently available only in the Region's CSO-SSO database needs to be entered into the national data system so that it will be accessible by OECA and the public. The new 3560 form (distributed in January 2006) contains a list of single event violations to facilitate data entry.

Recommendation Title: SNC Reporting

Element: E6 Timely & Appropriate Actions

Finding: Region was not timely in addressing and reporting SNC into the data system.

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: Regional Action

Recommendation Narrative: Region I should continue to improve its timeliness of addressing and reporting SNC to ICIS-NPDES. The work group already in place to look at this issue is a good start and should be encouraged. The group should share its findings and implementation schedule to OECA for review and comment.

Recommendation Title: Improve Calculation and Documentation of Economic Benefit

Element: E7 Penalty Calculations

Finding: Document consideration of Economic Benefit

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: The CARP should be followed and economic benefit calculated in each civil judicial case in order to ensure there is no economic benefit gained through non-compliance. Any deviation from the CARP should be fully documented in writing.

Recommendation Title: Consider use of injunctive relief instead of SEPs

Element: E8 Penalties Collected

Finding: Consider use of injunctive relief instead of SEPs

Status: Completed

Expected Completion Date: 05/22/2007

Responsible Agency: State Action

Recommendation Narrative: Develop procedures to evaluate whether a proposed SEP should be considered as injunctive rather than as an environmental project that would not otherwise be required.

Recommendation Title: Penalties

Element: E8 Penalties Collected

Finding: Region does not always report penalties into the data system.

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: Regional Action

Recommendation Narrative: Reporting penalties into ICIS-NPDES is not a requirement, but OECA suggest that Region 1 begin to report them in order to show the complete picture of their enforcement activities. The Region will enter penalty information into ICIS as it has in the past.

Recommendation Title: Data Quality

Element: E10 Data Timely

Finding: Data quality issues.

Status: Completed

Expected Completion Date: 03/31/2008

Responsible Agency: Regional Action

Recommendation Narrative: The Region should develop an SOP or management practice to assure that actions in ICIS-NPDES are appropriately linked to a NPDES facility or permit that SEV violations are entered in the data systems, and that inspections are reported in the data systems in a timely manner.

Recommendation Title: Data Quality

Element: E11 Data Accurate

Finding: Data quality issues

Status: Completed

Expected Completion Date: 12/31/2007

Responsible Agency: Regional Action

Recommendation Narrative: The Region should begin to link actions to violations in PCS (or ICIS-NPDES) as required.

Recommendation Title: Data Quality

Element: E11 Data Accurate, E12 Data Complete

Finding: Data quality issues.

Status: Completed

Expected Completion Date: 11/30/2007

Responsible Agency: Regional Action

Recommendation Narrative: For metric 12 g1 and g2, OC would like the Region to analyze why the non compliance rates seem so high and report back to OECA.

Recommendation Title: Data Quality

Element: E12 Data Complete

Finding: Data quality issues

Status: Completed

Expected Completion Date: 10/01/2007

Responsible Agency: Regional Action

Recommendation Narrative: The Region needs to improve its rate for “correctly coded limits” and begin tracking the items referred to as “informal actions” (described above) in the national data system.

Recommendation Title: Data Quality

Element: E12 Data Complete

Finding: Data quality issues.

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: Regional Action

Recommendation Narrative: If resources are an issue in implementing these recommendations, the Region may consider asking the State to assume some data entry responsibilities.

Resource Conservation and Recovery Act Recommendations

Recommendation Title: Staff cutbacks limit ability to meet inspection commitments

Element: E1 Insp Universe

Finding: Staff cutbacks limit ability to meet inspection commitments

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: In order to meet the national standard for annual and 5-year LQG inspection coverage, the additional compliance/enforcement PPA/PPG commitments, and to conduct significant state programs like the FQG and SQG Certification Programs discussed in Element 13, DES must address staffing cutbacks and shortages. DES should make every effort to fill the funded vacant inspector position and to re-establish the abolished SQG inspector position within the HWCB. EPA recommends that the vacant positions corresponding to WMS III #14731 and WMS IV # 42425 become filled as soon as possible to increase the current inspector pool to 4.5 FTE.

Recommendation Title: Provide resources to support inspection database

Element: E2 Violations ID'ed Appropriately

Finding: Provide resources to support inspection database

Status: Long Term Resolution

Expected Completion Date: 09/30/2009

Responsible Agency: State Action

Recommendation Narrative: DES should ensure that HWCB receives the resources and support to implement modifications and additions to the inspection Oracle database.

Recommendation Title: Improve inspection checklists so they can "stand alone"

Element: E2 Violations ID'ed Appropriately

Finding: Improve inspection checklists so they can "stand alone"

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: The checklists should be completed in enough detail to become "stand-alone" documents that become the foundation of subsequent enforcement work. A facility should not have to refer to an attached enforcement document to find the narrative that fully describes its violations. The checklists should be supplemented with a narrative description of all the violations observed during inspections. Region 1 recommends that DES, at minimum, establish a module or comment field dedicated to narrative violation descriptions.

Recommendation Title: Maintain complete copy of inspection reports

Element: E2 Violations ID'ed Appropriately

Finding: Maintain complete copy of inspection reports

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: HWCB should ensure that copies of complete inspection packages [as mailed to facility contacts] are retained in its enforcement files.

Recommendation Title: Include completion date on Inspection checklists

Element: E2 Violations ID'ed Appropriately

Finding: Include completion date on Inspection checklists

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: Inspection checklists should be revised to clearly indicate the date they were finished.

Recommendation Title: Update CARP to reflect EPA policies

Element: E4 SNC Accuracy

Finding: Update CARP to reflect EPA policies

Status: Completed

Expected Completion Date: 09/01/2007

Responsible Agency: State Action

Recommendation Narrative: Given that EPA's 2003 ERP, with its broadened definitions of SNC and SV, are currently applied by the state, DES should revise the September 27, 2000 CARP to incorporate EPA's 2003 ERP. At minimum, DES should issue a policy memorandum that incorporates the 2003 ERP by reference into existing CARP. This memorandum should require the consistent application of this more recent definition of SNC

Recommendation Title: Ensure DES has up-to-date EPA policies

Element: E4 SNC Accuracy

Finding: Ensure DES has up-to-date EPA policies

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: DES should develop a protocol to ensure that important national policies and guidelines received within the Department are distributed in a timely fashion to the appropriate program managers (e.g., EPA's 2003 ERP). Region 1 will also ensure that important national policies and documents are forwarded directly to the HWCB management.

Recommendation Title: Ensure facilities in certification program receive appropriate enforcement response

Element: E4 SNC Accuracy

Finding: Ensure facilities in certification program receive appropriate enforcement response

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: HWCB should ensure that facilities that have successfully participated in the FQG and SQG Certification Programs are not as readily given "first-time-inspected" deference when making decisions on violator status and formal enforcement.

Recommendation Title: SIS should deliver appropriate enforcement response

Element: E5 Return to Compliance

Finding: SIS should deliver appropriate enforcement response

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: SIS's enforcement protocol should be improved to readily escalate the level of enforcement for recalcitrant violators, as described in the CARP.

Recommendation Title: Improve SIS file documentation

Element: E5 Return to Compliance

Finding: Improve SIS file documentation

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: SIS's file documentation practices should be brought into par with those practiced by the HWCB.

Recommendation Title: Increase per day penalty cap

Element: E7 Penalty Calculations

Finding: Increase per day penalty caps

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: DES should review and revise (where appropriate) its Schedule of Fines to increase the per violation per day caps in order to allow the pursuit of administrative cases that might otherwise be forced down the civil enforcement route to recoup economic benefit.

Recommendation Title: Document economic benefit decisions in all administrative cases

Element: E7 Penalty Calculations

Finding: Document economic benefit decisions in all administrative cases.

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: All administrative case files should document whether or not a given violation resulted in a significant economic benefit. If no significant economic benefit was achieved, then a statement of fact should be found in the file. If significant economic benefit resulted from a violation, the estimated economic benefit amount should be clearly documented in the file.

Recommendation Title: Forgive fewer penalties

Element: E8 Penalties Collected

Finding: Forgive fewer penalties

Status: Working

Expected Completion Date: 09/30/2009

Responsible Agency: State Action

Recommendation Narrative: Administrative Fine settlements should clearly follow the guidelines established in the CARP for collecting appropriate minimum payments. In order to achieve this, DES should give greater consideration to penalties associated with some Class II violations and not unilaterally forgive all Class II violations to foster settlement. Based on case specifics, some Class II violations may be worthy of penalty collection

Recommendation Title: Ensure all actions are correctly coded in RCRAInfo

Element: E11 Data Accurate

Finding: Ensure all actions are correctly coded in RCRAInfo

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: The HWCB needs to enter separate actions in RCRAInfo for initial/proposed and final/settled formal enforcement penalty actions, and then ensure that the correct issuance dates are associated with the correct actions. Region 1 will work with DES to identify which RCRAInfo codes to utilize in future to ensure that this happens. At present, DES compliance staff only use a limited number RCRAInfo codes which, unfortunately, excludes most choices for proposed actions. EPA and the HWCB will discuss training needs on the use and maintenance of state data in RCRAInfo.

Recommendation Title: Ensure old violations are addressed

Element: E11 Data Accurate

Finding: Ensure old violations are addressed

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: DES and EPA have agreed to at least annually review a retrieval of long-standing violations to ensure that they are either addressed or accurately recorded in RCRAInfo in the event that they had already been addressed.

Recommendation Title: Reconcile differences between EPA and DES data annually

Element: E12 Data Complete

Finding: Reconcile differences between EPA and DES data annually

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: DES and EPA agree to annually review the Element 12 statistics as they are reflected in DES data bases and in RCRAInfo and to reconcile any differences between the two data sets.

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