

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

Pennsylvania Department of Environmental Protection (PADEP)

36 Recommendations

Clean Air Act Recommendations

Recommendation Title: Inspection universe

Element: E1 Insp Universe

Finding: The number of FCEs being conducted may be affecting the quality of FCE inspections and enforcement cases.

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: PADEP should determine whether its CMS commitments should be reduced in order to produce higher quality FCEs and stronger enforcement cases. This recommendation may apply only to certain regions where the workload per inspector is notably higher.

Recommendation Title: Title V Data

Element: E1 Insp Universe

Finding: Title V certification reviews are not accurately and completely entered into AFS.

Status: Completed

Expected Completion Date: 04/30/2008

Responsible Agency: State Action

Recommendation Narrative: Although the Title V Annual Certifications that are reviewed are done in a timely manner, PADEP should improve its reporting of Title V Annual Certification reviews as recommended in Data Element 11 to ensure that this data is accurate and complete in AFS.

Recommendation Title: Quality of Inspection Reports

Element: E2 Violations ID'ed Appropriately

Finding: The reviewers found the quality and level of detail of inspection reports to vary from inspector to inspector.

Status: Completed

Expected Completion Date: 09/27/2007

Responsible Agency: State Action

Recommendation Narrative: Federal Recommendation - Conduct training for PADEP Central Office and Regional enforcement management personnel on the April 2001 CMS Policy in conjunction with a Timely and Appropriate Meeting in FY-07.

Recommendation Title: Inspection Report Quality

Element: E2 Violations ID'ed Appropriately

Finding: The reviewers found the quality and level of detail of inspection reports to vary from inspector to inspector.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP Central Office or regional enforcement management personnel should train PADEP inspectors on the April 2001 CMS Policy after receiving EPA training.

Recommendation Title: Inspection Report Quality

Element: E2 Violations ID'ed Appropriately

Finding: The reviewers found the quality and level of detail of inspection reports to vary from inspector to inspector.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: Prior to the next scheduled printing, PADEP should review its current inspection form and modify the form to reflect all of the elements defined in the April 2001 CMS Policy.

Recommendation Title: Quality of Inspection Reports

Element: E2 Violations ID'ed Appropriately

Finding: The quality of compliance monitoring reports is inadequate.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should evaluate why the quality of the CMRs in the 2 regions reviewed are inadequate and determine whether this problem occurs in other regions as well.

Recommendation Title: HPV identification

Element: E4 SNC Accuracy

Finding: One potential HPV was not identified.

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: The one potential HPV that was not identified as such should be listed and tracked in AFS as an HPV.

Recommendation Title: Addressing HPVs

Element: E6 Timely & Appropriate Actions

Finding: Reviewers consider PADEP's untimeliness in addressing HPVs to be a significant vulnerability in PADEP's air enforcement program.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should evaluate its timeliness in "addressing" HPV as defined in EPA's Timely and Appropriate Enforcement Response to HPVs, June 23, 1999. The evaluation should identify the extent to which timeliness is problematic across the regions. PADEP should then implement changes in existing enforcement procedures to ensure that HPVs are addressed in a timelier manner. PADEP should continue to discuss with EPA violations at State-owned facilities. EPA will subsequently decide if follow-up action is warranted.

Recommendation Title: T&A enforcement

Element: E6 Timely & Appropriate Actions

Finding: Unclear as to why recordkeeping and monitoring violations at one source was not addressed with a formal enforcement action.

Status: Completed

Expected Completion Date: 09/30/2007

Responsible Agency: State Action

Recommendation Narrative: Investigate why recordkeeping violations at this source was not addressed with a formal enforcement action.

Recommendation Title: Penalty Calculation for CEM

Element: E7 Penalty Calculations

Finding: The standard penalty policy is not used for a CEM penalty, which is why no calculations were found in the files.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should develop procedures to ensure that all penalty calculations related to CEMs violations are documented and maintained in compliance monitoring and enforcement files in all regional offices.

Recommendation Title: Timely data for HPV

Element: E10 Data Timely

Finding: Need an expedited process to identify HPV.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP and EPA should terminate the Significant Violator Agreement dated 2/12/98. An expedited process to identify HPVs should be developed and the current MOU between EPA Region III and PADEP should be amended as appropriate to reflect these changes. PADEP should consider linking its HPV data as soon as possible.

Recommendation Title: Data Accuracy

Element: E11 Data Accurate

Finding: Improve the timeliness of reporting stack tests.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: All stack test data should be entered in conformance with the "The National Stack Testing Guidance". The stack testing event should be entered in AFS within 60 days of the date of the action using a result of "PP" (pass) "FF" (fail) or "99" (pending). Any stack test with a PENDING code is required to update the results to PASS or FAIL within 120 days of the regional stack test date.

Recommendation Title: Data Quality

Element: E11 Data Accurate

Finding: Quality Assure/Quality Control all data.

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: PADEP should provide a dedicated person who would be responsible for the completeness and accuracy of PADEP's data going into AFS. PADPEP should ensure that all personnel who are entering data to be uploaded to AFS are familiar with what is required.

Recommendation Title: Data Quality

Element: E11 Data Accurate

Finding: The "unknown compliance" status generation occurs when a source does not have an FCE within the frequency designated by the state.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should be more diligent about removing sources from the CMS plan that have changed class or operating status in order to minimize sources automatically reverting to an "unknown" compliance status in AFS.

Recommendation Title: Data Quality

Element: E11 Data Accurate

Finding: PADEP's accomplishments were under reported because a number of sources were misclassified.

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: Processes recently instituted should be continued to ensure the source class is consistent for both "State and EPA".

Recommendation Title: Data Quality

Element: E11 Data Accurate

Finding: EPA lead HPVs must assure compliance status data is accurate

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: Regional Action

Recommendation Narrative: EPA should develop procedures to ensure that all EPA-lead HPVs are listed in AFS as "out of compliance" and are returned to "Compliance" once the HPVs are resolved.

Recommendation Title: Data Quality

Element: E12 Data Complete

Finding: AFS entries differ from the actual NOV's issued

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: PADEP should verify the number of NOV's issued in FY-05 and correct any errors in AFS.

Recommendation Title: Data Quality

Element: E12 Data Complete

Finding: Data quality problem with 44 majors.

Status: Completed

Expected Completion Date: 09/28/2007

Responsible Agency: State Action

Recommendation Narrative: PADEP should identify why 44 major sources had blank CMSC flags in AFS and correct the errors as appropriate.

Clean Water Act Recommendations

Recommendation Title: Universe of Inspection Accuracy

Element: E1 Insp Universe

Finding: Based on the data metrics, PADEP has inspection coverage of 68.1% at majors, and 42.5% at non-majors with DMRs. This is inadequate.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP needs to verify that information which is entered into PCS for non-majors and other non-majors is accurate.

Recommendation Title: Inspection Report completeness

Element: E2 Violations ID'ed Appropriately

Finding: 57.6% of the inspection reports reviewed were adequately documented. This level of performance should be improved.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: Despite the fact that the forms used to document an inspection report have been recently updated, there should be some additional improvements including adding single event violation codes.

Recommendation Title: Inadequate inspection reports

Element: E2 Violations ID'ed Appropriately

Finding: 57.6% of the inspection reports reviewed were adequately documented. This level of performance should be improved.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: A photo log form, which could be included with the inspection report, would better fulfill the requirements of the NPDES Compliance Inspection Manual. A document receipt log could be used to record which documents were reviewed and/or photocopies to take off-site. A comment section may be included to help identify key points in the documents that are used to identify the requirement in the document that the facility is not meeting or how the document supports the determination that a permit requirement is not being met.

Recommendation Title: Inspection Report Completeness

Element: E2 Violations ID'ed Appropriately

Finding: 57.6% of the inspection reports reviewed were adequately documented. This level of performance should be improved.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should develop guidelines for what constitutes a minimum for an inspection report as well as management review procedures to ensure that inspections are complete and consistent.

Recommendation Title: Inspection Report Completeness

Element: E2 Violations ID'ed Appropriately

Finding: 57.6% of the inspection reports reviewed were adequately documented. This level of performance should be improved.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: Regional Action

Recommendation Narrative: EPA will assist PADEP in identifying upcoming NPDES inspector's training.

Recommendation Title: Timely Inspection Reports

Element: E3 Violations ID'ed Timely

Finding: The review team determined 59% of inspection reports are completed in a timely manner.

Status: Completed

Expected Completion Date: 12/30/2008

Responsible Agency: State Action

Recommendation Narrative: EPA recommends that inspection report forms be sent to the facility after the sample analysis and file reviews have been completed with a

complete list of findings. A standardized format, including timeframes of how to communicate an inspection finding where the state is alleging a violation should be developed.

Recommendation Title: Timely Inspection Reports

Element: E3 Violations ID'ed Timely

Finding: The review team determined 59% of inspection reports are completed in a timely manner.

Status: Completed

Expected Completion Date: 12/30/2008

Responsible Agency: State Action

Recommendation Narrative: Procedures should be established to integrate information from various sources about individual discharges into an effective data flow. Appropriate timeframes for the information flow should be established to ensure timely response to the information. An inspection report should be available within a week for review. The pre-enforcement screening should include procedures that review all information to determine if a facility triggered VRAC.

Recommendation Title: Identifying SNC

Element: E4 SNC Accuracy

Finding: PADEP does not enter SEV data into PCS for inspection based or self-reported violations. SNC are not reported to EPA in a timely manner.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP needs to develop a process for making SNC determinations for single event violations and reporting this information. This process will need to be developed in conjunction with the RIDE policy upon implementation.

Recommendation Title: SNC Identification

Element: E4 SNC Accuracy

Finding: PADEP does not enter SEV data into PCS for inspection based or self-reported violations. SNC are not reported to EPA in a timely manner. SNC violations which are not DMR related are not being entered into the database using the SEV code.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: SEV should be entered to indicate violations found during inspections.

Recommendation Title: Appropriate Enforcement Response

Element: E5 Return to Compliance

Finding: There were several cases where Act 537 was used to require injunctive relief instead of a formal enforcement action. PADEP does not have a policy or guidance as to when an Act 537 revision is appropriate vs. when enforcement action is appropriate.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: A strategy needs to be developed to insure that compliance with the Clean Water Act and the NPDES regulations is maintained and describes when it is appropriate to use Act 537 for compliance purposes. All formal state enforcement actions need to contain a compliance schedule of required actions or activities that returns the facility to compliance.

Recommendation Title: Timely and appropriate enforcement

Element: E6 Timely & Appropriate Actions

Finding: PADEP does not take timely enforcement actions to address significant non-compliers.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP needs to take timely enforcement action to address significant non-compliance. When looking at PCS there appears to be more violations that triggered 2 quarters of non-compliance. These SNCs should have been addressed with formal enforcement actions. There could be more SNCs that were not identified or entered into PCS and therefore not addressed properly.

Recommendation Title: Penalty calculations

Element: E7 Penalty Calculations

Finding: PADEP issued 95 enforcement actions with penalties. They had three actions in which the penalty calculations were preserved.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should document calculations to support assessed and final penalties. Calculations should include gravity and economic benefit.

Recommendation Title: Entering penalty calculations into the PCS.

Element: E8 Penalties Collected

Finding: PADEP does not enter penalty amounts or enforcement actions for non-majors into the national database.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: Calculations for economic benefit and gravity need to be included in penalty assessment documentation. Actions with penalties need to be entered into PCS.

Recommendation Title: Data Requirements

Element: E9 Grant Commitments, E10 Data Timely, E11 Data Accurate, E12 Data Complete

Finding: PADEP is not tracking all of the minimum data requirements.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP needs to develop a process for making SNC determinations for single event violations and reporting this information. This process will need to be developed in conjunction with the RIDE policy upon implementation.

Recommendation Title: Data Quality

Element: E9 Grant Commitments, E10 Data Timely, E11 Data Accurate, E12 Data Complete

Finding: PADEP is incorrectly using the SEV code. SNC violations which are not DMR related are not being entered into the data base using the SEV code.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: SEV should be entered to indicate violations found during inspections.

Recommendation Title: Data Quality

Element: E9 Grant Commitments, E10 Data Timely, E11 Data Accurate, E12 Data Complete

Finding: When looking at PCS there appears to be more violations that triggered 2 quarters of non-compliance. These SNCs should have been addressed with formal enforcement actions.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP needs to take timely enforcement actions to address significant non-compliance.

Resource Conservation and Recovery Act Recommendations

Recommendation Title: Identifying Violations

Element: E2 Violations ID'ed Appropriately

Finding: It does not appear that the PADEP is consistently following its guidance with regards to citing violations.

Status: Completed

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should take step to more consistently follow their guidance with regard to potential violations. The guidance on city violations suggests that potential violations are to be marked at "to be determined" on the preliminary report, and the inspection report completed with a violations or compliance determination, after clarification/sampling results/etc. are received.

Recommendation Title: SNC accuracy

Element: E4 SNC Accuracy

Finding: PADEP is not an Implementer of Record for the CM&E module of RCRAInfo. PADEP completes data entry forms which are forwarded to EPA for entry into the national data base. This is contributing to some data quality issues, and should be resolved when PADEP becomes IOR.

Status: Working

Expected Completion Date: 09/30/2008

Responsible Agency: State Action

Recommendation Narrative: PADEP should continue to move forward and EPA should provide support to the state toward becoming RCRAInfo IOR.

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