Region 8 GUIDANCE FY-2012
Performance Partnership Agreements
Environmental Protection Agency

Office of Enforcement, Compliance, and Environmental Justice

Colorado
Montana
North Dakota
South Dakota
Utah
Wyoming

May 9, 2011

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Introduction

EPA's national enforcement and compliance assurance program is multi-media in scope and breadth. The national program maximizes compliance with ten distinct federal environmental statutes through the use of compliance assistance, incentives, monitoring, and civil and criminal enforcement. OECA implements a total of 28 separate program areas dealing with prevention and control of air pollution, water pollution, hazardous waste, toxic substances, and pesticides. The statutory and regulatory requirements of these programs apply to a diverse universe of regulated entities. The majority of the work in the FY-2012 NPM is accomplished under the strategic goal "Compliance and Environmental Stewardship" in the draft FY 2009-2014 EPA Strategic Plan.

The NPM describes the key actions needed to accomplish this goal as proposed in the draft EPA *2009-2014 Strategic Plan Change Document* (http://www.epa.gov/ocfo/plan/pdfs/strategic_plan_change_document_9-30-08.pdf The Office of Enforcement and Compliance Assurance (OECA) has released their National Program Managers (NPM) Guidance document covering Administrators priorities, goals, initiatives and significant changes from the FY-2010 NPM guidance. This is included in the ECEJ Appendix 1. The NPM Guidance can also be located at the following website: http://www.epa.gov/finance/npmguidance/index.htm.

The NPM and Region 8 PPA guidance outline national program priorities and activities for enforcement and compliance regulatory programs for FY 2012. The guidance documents are prepared to assist the state in the development of an effective Performance Partnership Agreement with Region 8. This document includes updated information regarding performance commitment requirements, Regional and National priorities, EPA Administrators' priorities, Program Oversight activities, as well as core program guidance.

a. Performance Partnership Agreement (PPA) Requirements

The following section contains information regarding the maintenance of Core Programs, National Databases and Accountability measures that must be included in submitted PPA's.

A. Maintain Core Programs

The state agency must maintain and implement the core programs, as required by the federal and state statutes and rules, and as reflected in program authorizations and other formal agreements between EPA and the state.

- The FY2012 NPM Guidance provides a detailed, statute specific core program description.
- The State may also describe standard commitments in the Agreement that reflect core program activities (e.g. development of the Compliance Monitoring Strategy of the air program). Additional State specific language may be discussed during the negotiation of the Agreement, in accordance with the results of oversight results.

B. Maintain National Databases

The state agency must maintain national databases. This includes entering required data elements in a timely manner; performing appropriate data quality assurance and data validation tasks; and assuring timely, accurate, and complete information is available for retrieval by State and EPA staff and managers. The existing Final Enforcement and Compliance Data Quality Strategy and Description of Data Quality Strategy Implementation Plan Projects are included as Appendix 3 and 3a.

The Office of Compliance, Enforcement Targeting and Data Division, is developing a comprehensive Data Quality Strategy that will improve upon the disparate approaches previously used in order to provide a strategic vision and implementation schedule to assure that enforcement and compliance data can be used as an effective tool to manage our program and report on our accomplishments. This will become effective when completed. Additional details on specific activities to implement this strategy will be provided to State Agencies as they become available. Key elements include:

- Identification of key enforcement and compliance program data fields.
- Developing standards for verification and validation of the accuracy of data being entered into key data fields in each database
- Ensure full implementation of the Watch List project reporting by regional offices along with timely and complete reporting of necessary compliance and enforcement data to national databases
- Periodic random data audits and targeted data clean-ups
- Updating guidance on the input and use of certain key data fields in each database, including identifying where underlying media specific program guidance needs to be updated and/or revised
- Ensuring accurate data entry into legacy systems by state personnel.

***Suggested PPA Language**:*

"The State commits to entering required data into regional and national data systems so that federally required data fields are timely, accurate, and complete pursuant to definitions, guidance, and policy."

a. Safe Drinking Water Information System (SDWIS)
   - Ensure all enforcement actions are linked to violations in SDWIS. Exceptions to the list of currently identified orphan enforcement actions are:
     - S/E IB Compliance Meeting Conducted
     - S/E IC Tech Assistance Visit
     - S/E OY Variance/Exemption Issued
     - S/E OZ Turbidity Wavier Issued
     - S/E FE Boil Water Order

        - S/E FO Administrative Order with penalty)failure to comply with a previously issued AO (S/E FL)
    - Ensure any PWS's lacking lat/long and mad code data, have been identified, corrected and submitted for the quarterly reporting process to update SDWIS/Fed.
    - Ensure new regulatory violations are tracked and reported to SDWIS the quarter after occurrence. When draft guidance is issued, States should start working on tracking and implementing reporting requirements.
    - <u>To ensure that all regulatory rules are tracked and reported, states should use the most current versions of the SDWIS product. Currently SDWIS/State 2.3 and SDWIS Fed 3.2. FedRep will only support SQL and Oracle. Foxpro is no longer supported.</u>
    - Review, identify and correct in SDWIS all violations which should have return to compliance designation.
    - Pursuant to SDWA guidance, ensure that all violations, enforcements and samples data are reported the quarter following their occurrence to SDWIS/Fed.
    - States should report compliance assistance visits on a quarterly basis to SDWIS (a code under sanitary surveys). There is now a code for follow-up visits for formal enforcement that should be reported as they occur.

b. Permit Compliance System (PCS)/ICIS-NPDES
    - EPA will evaluate the States on how they maintain their PCS database for data integrity, completeness, timeliness and accuracy on all required Water Enforcement National Database (WENDB) data elements (for those states still using PCS) (Appendix 7) and the minimum data element specified in the December 28, 2007 Addendum to the PCS Policy Statement (for those states migrated to ICIS-NPDES) (Appendix 8) for state inspections, enforcement actions, and Discharge Monitoring Reports (DMRs); as well as completeness for all permit facility, permit tracking, locational data, pipe and flow data.

    - During FY2012 all states must adhere to all processes and requirements outlined in the PCS Policy Statement, including the December 28, 2007 Addendum for those states that have migrated to ICIS-NPDES (Appendix 8). .

    - Because the PCS database is being replaced by the new ICIS/NPDES database, EPA has recommended that States clean up PCS missing or inaccurate facility and pipe-level information in addition to the above evaluation criteria. EPA Headquarters has identified 34 facility WENDB data elements that are to be entered into PCS for every active permit (the information to populate these fields is obtained from individual NPDES permit applications and their Statement of Basis/Rationale) (Appendix 7). EPA is working with each State to complete this effort. To facilitate the States in their data

cleanup, a Data Migration Guidance Document has been compiled by Headquarters that will guide the States on how to cleanup their PCS data. Also, Headquarters has weekly ICIS-NPDES Cleanup Calls for the States that are cleaning up their PCS data to answer any questions or concerns the States are having.

c. Air Facility Registry System (AFS)
   - Data is an integral part of the CAA compliance and enforcement program; therefore, it is essential that Regions and delegated agencies enter complete and accurate information into the national database in a timely manner. Complete, accurate and timely data is necessary for EPA, delegated agencies and the public to evaluate programs and institute corrections. A complete list of MDRs as well as the CMS and HPV Policies, can be found at the following website and in Appendix 12. http://www.epa.gov/compliance/data/systems/air/afssystem.html The PPA should include the following data related elements:
     - States will provide complete, accurate, and timely data consistent with the MDR's as well as the CMS and HPV Policies.
     - States will report the compliance results of all FCEs and negotiated PCEs into AFS as soon as practicable after a compliance determination is made.
     - States will coordinate with EPA to ensure that CMS sources are flagged in AFS for inspection, and to ensure that high priority violations and associated enforcement actions are correctly identified in AFS.
     - States will report 100% of the stack tests and the results (pass/fail) in AFS when a compliance determination has been made.
     - State will make appropriate corrections to AFS as identified by the Regions or HQ's
   - Additional State-specific language may be discussed during the negotiation of the Agreement, in accordance with results of the Oversight assessments.

C. Accountability Measures

Region 8 anticipates that each State will adopt the performance measures agreed to by EPA and ECOS. The enforcement and compliance assurance outcome and output measures should be included in the Agreement. Additional and/or alternative measures may be discussed during the Agreement negotiation period. The enforcement accountability measures are included in ECEJ Appendix 2.

D. Exchange Network

a. **ICIS-NPDES**

An Exchange Network data flow for ICIS-NPDES is partially available. Partners can use the Exchange Network to submit Discharge Monitoring Reports and permit data. Data flows are currently being developed to handle inspections, enforcement

actions, and all other NPDES data families. Those data flows are expected to be ready in 2013 at which point all states will need to migrate away from the legacy Permit Compliance System (PCS). At that point, the Exchange Network will be the only means of submitting NPDES information to EPA other than manual data entry.

More information on this data flow including known barriers and practical implementation advice is available at http://www.exchangenetwork.net/exchanges/ICIS%20NPDES%20flow%20implementation.pdf

b. States that are currently using the NPDES Permit Compliance System (PCS) need to prepare to migrate to the modernized data system, ICIS-NPDES. The batch data flow capability from States to ICIS-NPDES through EPA's National Environmental Information Exchange Network is currently under development and is scheduled to be implemented in three distinct releases.
    - The first release, scheduled for February 2011, will provide functionality for the transmittal of Permit and Facility information.
    - The second release, scheduled for January 2012, will provide functionality for the transmittal of Inspection information.
    - The final release, scheduled for March of 2013, will provide functionality for the transmittal of remaining NPDES data families to include Enforcement Actions, Single Event Violations, and Program Reports.

c. Actively market and implement the use of NetDMR or other e-DMR tools by permittees for the electronic transfer of Discharge Monitoring Reports (DMR) to ICIS-NPDES, supported by use of the National Environmental Information Exchange Network (Exchange Network), by all of their NPDES permitted facilities.

d. Establish that reporting NPDES data using the Exchange Network (i.e., operations and maintenance) is an eligible activity for funding under categorical program grants.

e. Based on the information above, States may want to ask your programs of any additional details about the states plans in using ICIS-NPDES and the National NetDMR or other e-DMR tool they might like to include.

f. States using PCS should identify plans, with milestones, for migrating to ICIS-NPDES and identify any barriers.

g. States should identify plans for using the National NetDMR or other e-DMR tool.

b. FY2012 REGIONAL PRIORITIES AND PPA AREAS OF EMPHASIS

Each of these areas of emphasis should be considered during negotiations for the PPA for FY 2012. It is recognized that there are certain functions—like monitoring, permitting, inspecting, technical assistance, enforcement, etc.—that form the core of our work. They are the underpinnings of all we do. These special emphasis areas represent either an outgrowth of our core work, or a focusing of attention on a particular segment of these core programs. It is because of our ability to perform our core activities that we have the opportunity to select certain areas for emphasis in the upcoming year. The following list includes the primary areas of emphasis including: Regional Priorities and Goals, Environmental Justice (EJ), Inspection Projections, Compliance Assistance and Facility Watch List.

A. Regional Priorities

In Region 8 there are five overarching strategic goals and several cross-cutting fundamental strategies that support the Agency's Strategic Plan. This will assist Region 8 in accomplishing our mission of protecting human health and safeguarding the environment. Region 8 will work in partnership with the States and our Tribal Partners to accomplish our goals. The list below contains Region 8's goals and strategies:

- Taking Action on Climate Change
- Improving Air Quality
- Assuring the Safety of Chemicals
- Cleaning up Our Communities
- Protecting America's Waters
- Expanding the Conversation on Environmentalism and Working for Environmental Justice
- Building Strong State and Tribal Partnerships
- Agriculture
- Energy
- All Hazards Response
- Technological Innovation

B. Environmental Justice

Environmental Justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people including a racial, ethnic, or socioeconomic group, should bear a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of Federal, State, Local and Tribal programs and policies.

States should incorporate environmental justice into their programs, and document their commitments in the Agreement. There are five general areas where environmental justice commitments can be made, including development of environmental justice information: integration of

environmental justice in ongoing programs; training of staff in environmental justice principles; full and appropriate involvement of the communities in environmental decisions and development and application of measures of success.

Suggested PPA Language:

- *The State will advance Environmental Justice goals in the following activities.*
  - *Identify locations of environmental hazards in low income and minority communities*
  - *Consider disproportionate impacts when permitting major facilities in low income and minority communities*
  - *Identify and address disproportionate impacts when conducting enforcement activities in low income and minority communities*
  - *Seek remedies through enforcement actions which directly benefit disproportionately impacted low income and minority communities*
  - *Determine whether any on-going or proposed State activities, contribute to or cause adverse impacts on low income or minority populations*
  - *Assist low income and minority communitie4s in developing an understanding of environmental issues through meetings, workshops and other appropriate forums*
  - *Communicate with potential environmental justice communities to assure such communities that environmental justice concerns are being addressed in and through their actions*
  - *Ensure that opportunity for community input from low income and minority populations is considered and obtained early in the State's processes*
  - *Consider the adoption of an Environmental Justice Policy and the creation of a review entity, such as an advisory board, to monitor and address environmental justice issues*
  - *Create evaluation measures to facilitate an assessment of the effectiveness of environmental justice activities*
- *EPA will provide the state access to environmental justice information tools, provide information to the State on environmental justice grants, including Community Action for a Renewed Environment (CARE), and provide Environmental Justice training for State staff and managers.*
- *The State and EPA will meet regularly to discuss environmental justice issues of mutual concern.*

C. Inspection Projections

Regions are asked to provide projections of program activity, for regional and state inspections and for addressing drinking water significant noncompliance (SNC). The inspection targets for CAA, CWA and RCRA and SNC rates are tracked in the Annual Commitment System (ACS). For FY 2012 the State

and Region will hold discussions on projections of program activity target levels. Activities should be discussed concerning both state and regional coverage of work, and then recorded in the Agreement. These figures will also be entered into the ACS for fiscal year tracking.

Suggested PPA Language:

"The State provides target projections for state inspections for each media program by the end of September of each year."

D. *Compliance Assistance*

In FY 2012 Compliance Assistance (CA) will continue to be a focus area for OECA and Region 8. To maximize the effectiveness and results of the National CA Program, Region 8 asks its state partners to also make a commitment to using CA as a viable compliance assurance tool. Specifically, Region 8 would like its states to include language in their PPA Agreements within each program section as indicated in the following Suggested PPA Language.

In addition to including the suggested PPA language placed in each PPA program section, Region 8 asks its states to comply with the following commitments:

- Build and maintain a strong CA core program infrastructure to encourage effective communication networks. This would include the identification of one state contact that would represent the state on all CA issues and efforts. This primary contact person would interface regularly with the Region 8 CA Program to ensure effective communication between the state and federal levels.
- Identify opportunities for collaboration with Region 8 in terms of CA projects. This approach maximizes limited resources within both offices and provides a great learning opportunity for both parties.

Suggested PPA Language:

"This program will include strategic planning as part of its yearly program planning process, for up front consideration and appropriate use of compliance assistance in addressing environmental problems (either single media or multi-media)".

E. Facility Watch List

As OECA has asked the Region's to place a high priority on addressing enforcement "watch lists" which includes unaddressed Significant Non-Compliers. The Region will ask the states to commit to: 1) review watch lists, 2) discuss unaddressed facilities with EPA, and 3) coordinate with the Region on a plan to address them (which may include work-sharing)."

C. OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE (OECA) PROGRAM PRIORITIES, ENFORCEMENT INITIATIVES, (2011-2013), CROSS CUTTING STRATEGIES (FY-2011 –FY-2015) AND SIGNIFIGANT CHANGES FROM FY-2011

A. Program Priorities

OECA's work aligns with and implements the Administrator's priorities in the following ways:

1. Taking Action on Climate Change: Enforcement supports the Agency's climate strategy by recognizing reductions of global warming pollution in settlements of enforcement actions. OECA will be working to support the integrity of the monitoring and reporting system for global warming pollution by assuring compliance with the greenhouse gases reporting rule.

2. Improving Air Quality**:** Enforcement helps improve air quality in communities by targeting large pollution sources, especially in the utility, refinery, cement and glass industries, and taking aggressive action to bring them into compliance and to install controls that will benefit communities and improve emission monitoring. OECA is working closely with the Office of Air and Radiation to reduce toxic air pollution, through protective enforcement, permitting and standards, especially in communities that are disproportionately affected by pollution now. OECA will continue to work with States and Tribes to improve monitoring of compliance with air pollution standards and make sure that action is taken against serious violations that affect community air quality.

3. Assuring the Safety of Chemicals**:** As the Agency steps up its review of chemical safety and pushes for reform, OECA will work closely with OCSPP to achieve its goals. The enforcement program will take action when we find violations of standards for high-concern chemicals.

4. Cleaning Up Our Communities**:** Enforcement ensures that parties responsible for contamination step up to their cleanup responsibilities. By ensuring that the polluter pays whenever possible, OECA's efforts result in more cleanups, which protect more communities from exposure and returns properties to productive use. OECA will also use enforcement to spur clean up at RCRA corrective action sites where the clean up progress is stalled.

5. Protecting America's Waters**:** OECA is revamping the water enforcement program to focus on the problems that are the biggest threat to the nation's waters. At the same time, OECA will increase oversight of the States and work to define the shared accountability of EPA, States and Tribes for clean water. OECA will improve transparency, to enlist the public in holding sources and government accountable.

6. Expanding the Conversation on Environmentalism and Working for Environmental Justice: In all the enforcement work OECA does, as described above, OECA can help protect communities by targeting

enforcement in areas where we find serious noncompliance and where communities face multiple pollution threats. OECA works with other federal agencies to make sure environmental justice considerations are included in their decision making process as they prepare environmental analyses (environmental impact statements or environmental assessments) under NEPA. OECA also will make more available and understandable information on facility compliance and government response, so that people have the information they need to take action to improve their own communities.

7. Building Strong State and Tribal Partnerships: EPA shares accountability with States and Tribes for protecting the environment and public health. With the current economic challenges, it is important that EPA and its partners work efficiently and effectively to do the most we can with the resources we have. At the same time, OECA will strengthen oversight of States that implement federal environmental programs, and support States that take strong enforcement action to protect their citizens by making sure that we hold all States to a comparable standard.

B. OECA's Enforcement goals for FY2012 are to:

Aggressively go after pollution problems that make a difference in communities. Use vigorous civil and criminal enforcement that targets the most serious water, air and chemical hazards; and advance environmental justice by protecting vulnerable communities.

1 Clean water
- Clean water act action plan: revamp enforcement and work with permitting to focus on the biggest pollution problems, including
  - Get raw sewage out of the water
  - Cut pollution from animal waste
  - Reduce polluted storm water runoff
- Assure clean drinking water for all communities, including in Indian country
- Clean up great waters that matter to communities, e.g, Chesapeake Bay

2 Clean air
- Cut toxic air pollution in communities
- Reduce air pollution from largest sources, including coal fired power plants, cement, acid and glass sectors

3 Climate and clean energy
- Assure compliance with greenhouse gas reporting rule
- Encourage greenhouse gas emission reductions through settlements
- Target energy sector compliance with air, water and waste rules

4 Protect people from exposure to hazardous chemicals
- Prevent releases of hazardous chemicals that threaten public health or the environment
- Press for clean up of hazardous sites in communities: polluter pays

- Reform chemical management enforcement and reduce exposure to pesticides focus on specific areas aimed to help achieve clean water, clean air, and climate and clean energy, and to protect people from exposure to hazardous chemicals.

Reset our relationship with States: make sure we are delivering on our joint commitment to a clean and healthy environment.

1. Shared accountability
    a. Make joint progress with States and Tribes toward clean air and water goals, protection from exposure to hazardous chemicals
    b. Work toward shared focus on protecting vulnerable communities
2. Strengthened oversight
    a. Assure strong and effective State enforcement of federal environmental laws
    b. Press for consistent enforcement across States and Regions: fairness and level playing field
3. Establish new model for shared accountability and strengthened oversight, starting with water
    a. Build focus on highest priority problems into grants, enforcement and permitting agreements
    b. Define clear expectations for state performance
    c. Take federal action where not meeting minimum expectations

Improve transparency

- Make meaningful facility compliance information available and accessible using 21st century technologies
- Hold government accountable through public information on state and federal performance
- Promote better federal environmental decisions and public engagement through NEPA

C. Development of Enforcement Initiatives

To help implement these enforcement goals, OECA selects a limited number of National Enforcement Initiatives based upon significant environmental risks and noncompliance patterns. In FY 2010, EPA re-examined the existing initiatives to look for opportunities to clarify goals and measures, more accurately identify universes of sources, and, where necessary, to change the focus of an Initiative. In addition, EPA considered candidates for new National Enforcement Initiatives. After consulting with EPA programs and Regions, States, Tribes, and the public, OECA adopted the following National Enforcement Initiatives for 2012 through 2013; more information on each is found in the media sections of the OECA NPM guidance:

1. Keeping raw sewage and contaminated stormwater runoff out of our waters
2. Cutting animal waste to protect surface and ground waters

3. Reducing widespread air pollution from the largest sources, especially the coal-fired utility, cement, glass, and acid sectors
4. Cutting toxic air pollution that affects communities' health
5. Assuring energy extraction sector compliance with environmental laws
6. Reducing pollution from mineral processing operations

D. Cross Cutting Strategies in the FY2011-2015 Strategic Plan

1. Expanding the Conversation on Environmentalism
    a. Data regarding state assessments, priorities and performance under the Clean Water Act (CWA) should be made public, where possible, on a regular basis in a manner easily understood and used by the public
    b. Compliance data should distinguish State information from Indian country information
    c. Information should be made available to communities, including Native American and Alaskan Natives, who lack access to the internet
    d. Criminal Enforcement program will continue to develop its use of new outreach methods such as Facebook, Twitter and mobile applications to encourage the public's reporting of potential violations and to provide leads through the fugitives website www.epa.gov/fugitives/
2. Strengthening State, Tribal and International Partnerships
    a. Regions will continue to implement the CWA Action Plan in FY2012 by collaborating with states to address NPDES permitting, compliance monitoring, and enforcement activities, including work-sharing
    b. A majority of program narratives in the FY2012 guidance contain specific activities regarding state relationships
    c. Regions should consult as appropriate, with potentially impacted tribal governments when conducting inspections and addressing noncompliance at tribal and non-tribal facilities in Indian country
3. Working for Environmental Justice (EJ) and Children's Health
    a. Regions are directed to use the Agency's environmental justice tools and methodologies to focus enforcement and compliance efforts in communities overburdened by exposure to environmental risks, including minority and low-income communities, as well as those with greater concentrations of sensitive populations
    b. Specific OECA (EJ) performance expectations, which include children's health as appropriate, are discussed in Section II of the OECA FY-2012 NPM Guidance

E. Significant Changes from FY2010

The Office of Enforcement and Compliance Assurance's FY 2012 guidance continues to focus on the Administrator's goals, and on aligning enforcement and compliance priorities with those of the other EPA national managers. As in the FY 2011, the FY 2012 guidance is organized to describe the specific expectations for Regions that implement the Administrator's priorities and explains how the

enforcement program supports the priorities of other EPA national programs. There are some notable changes in specific programs contained within this guidance and can be summarized as follows:

1. **Clean Water Action Plan**: The FY2012 guidance contains more specific instructions for the regions and states on how to implement the Clean Water Action Plan such as replacing existing paper reporting with electronic reporting, creating a new compliance paradigm, retooling key NPDES permitting and enforcement activities, and conducting comprehensive and coordinated permitting, compliance, and enforcement programs.

2. **Wetlands Program**: The FY2012 guidance sets expectations for the regions to participate in a Section 404 Enforcement Strategy pilot program to improve coordination and communication between EPA and the Corps of Engineers to improve management of the wetlands protection program.

3. **Oil Spills**: In light of the events of the British Petroleum oil spill the FY2012 guidance has been expanded to provide more detailed instructions on the compliance and enforcement activities of an effective oil spill program.

4. **Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Program**: Each year regions are asked to place special emphasis on key focus areas within the FIFRA program. In FY2012, an optional focus area has been included to provide flexibility to the regions on where to focus their efforts. This flexibility allows for more opportunities to support the Office of Chemical Safety and Pollution Prevention's program priorities.

d. PROGRAM OVERSIGHT

State RCRA, NPDES, Air, and PWSS enforcement program performance will be evaluated as described in the attached draft document entitled, ***Regional Plan for Region 8's Implementation of the State Review Framework (SRF), Uniform Enforcement Oversight System (UEOS) and Other Oversight Activities for the CWA NPDES, CAA Stationary Sources, RCRA Subtitle C, and Public Water System Supervision (PWSS) Enforcement Programs through FY 2012*** and as described in the state-specific State Oversight Plan which will be forwarded to each state environmental director in draft for comment by April 30 of each year and as final no later than September 30 of each year. Oversight activities planned for FY 2012 are based on program performance as determined through the OECA/ECOS State Review Framework (SRF) and, for PWSS, Uniform Enforcement Oversight System (UEOS) evaluations as well as in the FY 2010 end-of-year reports.

National data that will be used to support the SRF reviews are available to the regions and states through OTIS management reports and states are encouraged to periodically look at the data, ensure its accuracy, and use it in managing their programs. The OTIS management reports and other information regarding the SRF are available at: http://www.epa.gov/idea/otis/stateframework.html.

Suggested PPA Language

"State RCRA, NPDES, Air, and PWSS enforcement program performance will be evaluated as described in the draft ***Regional Plan for Region 8's Implementation of the State Review Framework (SRF), Uniform Enforcement Oversight System (UEOS) and Other Oversight Activities for the CWA NPDES, CAA Stationary Sources, RCRA Subtitle C, and Public Water System Supervision (PWSS) Enforcement Programs through FY 2012****(which was included with the FY 2012 PPA Guidance to States) and as described in the state-specific State Oversight Plan."*

e. PROGRAM SPECIFIC GUIDANCE

A. CAA – National Enforcement Initiatives

a. **Air Toxics in Communities**

a. **Maximum Achievable Control Technologies (MACT)**

a. The MACT program has been identified by OECA as a national priority. During the FY 2011-2013 period, the national enforcement initiative will focus on excess emissions caused by facilities failure to comply with LDAR, flaring and excess emissions during start-up, shutdown and malfunctions. Region 8 will continue with its LDAR efforts at MACT HH facilities and investigating flaring at refineries, and oil and gas facilities.

Suggested PPA Language

"During the FY2011-2013 period, EPA and the State will collaborate on investigating and inspecting facilities as they relate to LDAR under MACT HH and flaring at refineries and oil and gas facilities. Also, facilities with excess emissions during start-up, shutdown and malfunctions will be targeted for investigations and inspections."

b. States will provide information to EPA adequate to support a complete and up-to-date universe of MACT facilities in Region 8. States will annually submit a written and electronic report to EPA by November of the fiscal year for which this guidance is forwarded, to include the MACT sources in the respective States (including the facility's name, AFS number, MACT Subpart and source size classification).

c. EPA Region 8 will also conduct lead inspections targeting facilities for those MACTs which the state has not received delegation.

d. EPA Region 8 will continue to provide guidance and assistance in rule implementation, compliance determinations, and other case by case issues where EPA may need to make a final decision.

Suggested PPA Language

"During FY 2011, the State will provide information to EPA adequate to support a complete and up-to-date universe of MACT facilities. The State will annually submit a written and electronic report to EPA by November of the fiscal year for which this guidance is forwarded to include, the sources within the MACT categories for which delegation has been accepted (including the facility's name, AFS number, MACT Subpart and source size classification)."

b. **New Source Review/Prevention of Significant Deterioration (NSR/PSD)**
    a. During FY2011-2013, OECA has determined that EPA will continue its PSD/NSR enforcement efforts against refineries, coal-fired power plants, cement plants, sulfuric and acid plants, and glass manufacturing facilities. Region 8 will continue to develop and settle regional cases involving PSD/NSR compliance issues at coal-fired power plants, refineries, cement plants, sulfuric/nitric acid plants, and glass manufacturing facilities.

Suggested PPA Language:
"EPA will continue to investigate facilities for potential violations of PSD/NSR requirements focusing on Coal Fired Power Plants, Refineries, Cement Plants, Glass Manufacturers, Sulfuric/Nitric Acid Plants and Oil and Natural Gas Production facilities."

b. **Energy Extraction**
    a. OECA has selected Energy Extraction as a new sector for FY2011-2013. Region 8 will continue to focus on oil & natural gas facilities as it relates to PSD, MACT Subpart HH and Subpart ZZZZ and other areas as identified in the energy extraction strategy that will be finalized later this summer.

Suggested PPA Language:
"EPA will continue to investigate oil and natural gas facilities for potential violations of PSD, MACT Subpart HH and Subpart ZZZZ and other areas of potential concern. EPA investigations will be primarily focused on tribal lands but may include investigations of companies operating across tribal/state jurisdiction."

c. CAA – Core
    1. Additional state specific language may be discussed during the negotiation of the Agreement in accordance with the results of the enforcement programs State Review Framework.

    2. The Annual Commitment System (ACS) for FY2012 requires that draft targets (inspection numbers) be entered into the system by July 1st, 2011 and are finalized September 30th, 2011. States will

provide EPA with its inspection numbers so that EPA can submit the data into the system by the required timelines.

3. The States should continue to implement the CMS, National Stack Testing Guidance, HPV Policy, and the Area Source Implementation Guidance.

B. CWA-NPDES

a. Clean Water Act Action Plan
   - OECA is currently working with EPA regions, states and the Office of Water to implement the CWA Action Plan (the Action Plan) issued in October 2009. The Action Plan's three key elements are: 1) to focus our NPDES enforcement efforts on pollution sources that pose the greatest threats to water quality; 2) to strengthen oversight of state permitting and enforcement programs; and 3) to improve the accessibility and quality of information we provide to the public. These elements are consistent with the Assistant Administrator's goals for the compliance and enforcement program, which includes aggressively going after pollution problems that make a difference in communities, resetting our relationships with States and making important information available to the public. In support of the Action Plan, EPA and States will:
     - Conduct planning meetings between EPA and State NPDES compliance and enforcement, permitting and water quality standards personnel to identify water quality issues of greatest concern for each state, and develop collaborative annual work plans to leverage both State and EPA resources to address these issues. Plans for FY2012 will be developed by September 15, 2012.
     - Conduct quarterly meetings between EPA and each state to discuss progress towards meeting annual permitting and enforcement commitments.

   Suggested PPA Language

   "The State and EPA will work together to implement the Clean Water Act Action- Plan. The State and EPA will conduct planning meetings including NPDES compliance and enforcement, permitting and water quality standard personnel to identify water quality issues of greatest concern for each state, and develop collaborative annual work plans to leverage both State and EPA resources to address these issues. A collaborative work plan will be developed prior to September 15, 2011 for FY2012. The State and EPA will conduct quarterly meetings to discuss progress towards meeting annual permitting and enforcement commitments."

b. NPDES National and Regional Enforcement Initiatives
   - EPA will perform inspections in regional and national enforcement initiatives according to national guidance and the national 2011-2013 Performance Based Strategies and the

collaborative annual work plans. The enforcement initiatives include: Municipal Wet Weather Infrastructure, which includes Sanitary Sewer Overflows (SSOs), Combined Sewer Overflows (CSOs) and Municipal Separate Storm Sewer Systems (MS4s); Concentrated Animal Feeding Operations (CAFOs); and Energy Extraction. EPA will conduct inspection follow up and enforcement for those facilities it inspects.

- States are encouraged to pilot the Wet Weather SNC Policy in FY12.

Suggested PPA Language

"EPA will perform inspections in regional and national enforcement initiatives according to national and regional guidance and the national 2011-2013 Performance Based Strategies and the collaborative annual work plans. The enforcement initiatives include: Municipal Wet Weather Infrastructure; Concentrated Animal Feeding Operations (CAFOs); and Energy Extraction. EPA will conduct inspection follow up and enforcement for those facilities it inspects. "

"States are encouraged to pilot the Wet Weather SNC Policy in FY12. "

Municipal Wet Weather Infrastructure

a. Sanitary Sewer Overflows (SSO)

- Each state should continue to implement its draft SSO response plans. SSOs must be entered into PCS/ICIS-NPDES as single event violations in accordance with the PCS Policy Statement and its addendums.

- States should commit to provide to EPA by October 15, 2011 the following information: a) an updated SSO inventory; b) the number of NPDES inspections targeted to identify SSOs; c) the number and percent of SSO inspections in priority watersheds including the name of the priority watershed; d) the number and type of informal and formal enforcement actions taken in response to SSOs; e) the percent of enforcement actions in priority watersheds for SSO; and f) a list of SSOs addressed. Copies of all SSO inspections and enforcement actions should be submitted to EPA.

- EPA and states continue to investigate municipal systems to determine whether the systems have an appropriate operation and maintenance system and adequate capacity to handle current and projected flows. Based on these investigations, EPA has set goals for addressing SSOs for large municipal systems (total treatment capacity of > 100 MGD) and medium municipal systems (total treatment capacity of > 10 MGD, < 100 MGD) and their associated satellite systems. A facility is

considered "addressed" when one of the following conditions is met:

a. The facility is under a final federal administrative order (AO) or entered federal civil judicial consent decree that includes an enforceable schedule with milestones to implement any necessary remedial measures, and ensure that an adequate operation and maintenance program is in place; or

b. The facility is named in a federal civil judicial complaint that has been filed; or

c. The facility is subject to an enforceable state administrative or judicial order that meets federal requirements for compliance expeditiously and includes appropriate penalties; or

d. The facility received a federal investigation which documents a de minimus spill rate and that adequate capacity, operation and maintenance procedures are in place to maintain the de minimus spill rate.

We will be discussing state-specific and EPA-specific commitments for meeting the goals of investigating and addressing medium municipal systems and their associated satellites in FY12. The level of commitment we will be asking for will be based on the number of medium systems in the state as well as the progress the state and EPA have already made towards addressing these systems. EPA will conduct a portion of the investigation and enforcement follow up for systems in the states.

Suggested PPA Language

Enter SSOs into PCS/ICIS-NPDES as single event violations in accordance with the PCS Policy Statement and its addendums. The State will provide to EPA by October 15, 2011 a report including the following information: a) an updated SSO inventory; b) the number of NPDES inspections targeted to identify SSOs; c) the number and percent of SSO inspections in priority watersheds including the name of the priority watershed; d) the number and type of informal and formal enforcement actions taken in response to SSOs; e) the percent of enforcement actions in priority watersheds for SSO; and f) a list of SSOs addressed. Copies of all SSO inspections and enforcement actions should be submitted to EPA.

The State and EPA will conduct an investigation of the current operation and maintenance, capacity and future capacity, based on projected increase of flows, for the following systems: ____

(systems to be determined by State and EPA based on the number of medium systems in the State as well as the progress the State and EPA have already made towards addressing these systems. The systems will be identified as receiving either an EPA or State investigation.) The investigation may consist of a review of information provided by the municipalities and satellite systems, inspections of the collection systems or any other means that accurately characterizes the system.
For those systems that the State conducts the investigation, the State will provide EPA the operation and maintenance and capacity analysis for the systems identified by __ (date agreed upon by EPA and State). If the State determines that a facility does not have adequate operation/maintenance procedures, capacity or the mechanisms to ensure that the additional capacity is provided commensurate with increase in flows, the State and system will enter into an administrative or judicial action which includes an enforceable schedule and appropriate penalty. For those systems the State determines have a de minimus spill rate and are properly designed, operated and maintained, EPA will review the State analysis and will conduct any necessary follow up (inspections, information requests, etc.) to determine if EPA can support the State's determination. For those systems which EPA conducts the investigation and determines that an enforceable schedule is warranted, EPA will take the enforcement action, or consider joint EPA/State enforcement to address the issues. In addition, other smaller municipal collection systems causing identifiable and significant public health and/or water quality impacts shall be similarly addressed."

2. Storm Water
    - States should indicate in the PPA the number of inspections they intend to perform (this number should indicate the number of Phase I and Phase II MS4 audits and inspections; the number of Phase I and Phase II storm water construction inspections; and the number of storm water industrial non-construction inspections). Storm water inspections should be incorporated in the annual NPDES inspection plan which should identify the names of the targeted industrial facilities, where known, the geographic area targeted for construction inspections, and sector areas targeted. Priority should be given to conducting storm water inspections at non-filers, where there is water quality degradation, and in response to citizen complaints. States should conduct audits of Phase I MS4s every 5 years, and inspect them as needed based upon permit compliance. The current goal of the initiative is to address all Phase I MS4s by FY16. States should implement their Phase II audit and

inspection plan to determine compliance at all Phase II MS4s within the next three years. Commitments for conducting inspections of Phase I and II storm water construction sites and industrial sites should be based on the collaborative annual work plan and Compliance Monitoring Strategy (CMS). Storm water inspections should be entered in PCS/ICIS-NPDES or reported to EPA manually by April 30 and October 31 of each year if the state chooses not to enter the inspection into PCS or ICIS-NPDES. Manual reports should contain the same information that would be provided in PCS/ICIS-NPDES. Copies of all storm water inspection reports and enforcement actions should be provided to EPA.

- States shall provide EPA with a copy of their current storm water permit tracking system (or a list of all new and inactivated storm water permits) semiannually by April 30 of and October 31 of each year. Quarterly, States shall provide EPA with a current number of industrial and Phase I and Phase II construction storm water permits (October 31, January 31, April 30 and July 31).

- States should agree to update the State Enforcement Response Guide (ERG) to include storm water within six months of EPA's final storm water ERG

- States that have joined EPA in a national enforcement case will agree to inspect an agreed upon subset of new sites after the consent degree is final. These inspections will be memorialized in the state's inspection plan.

Suggested PPA Language

"The State will perform ____ Phase I MS4 audits, ___ Phase I MS4 inspections, ___ Phase II MS4 audits, ___ Phase II MS4 inspections, ___ Phase I construction inspections, ____Phase II storm water construction inspections, and ____storm water industrial non-construction inspections in FY12. The number of storm water inspections the State conducts will be incorporated in the annual NPDES inspection plan which will identify the names of the targeted industrial facilities, where known, the geographic area targeted for construction inspections, and sector areas targeted. Priority will be given to conducting storm water inspections at non-filers, where there is water quality degradation, and in response to citizen complaints."

"Storm water inspections will be entered in PCS/ICIS-NPDES or reported to EPA manually by April 30 and October 31 of each year if the State chooses not to enter the inspection into PCS or ICIS-

NPDES. Manual reports should contain the same information that would be provided in PCS/ICIS-NPDES. Copies of all storm water inspection reports and enforcement actions should be provided to EPA."

"The State will provide EPA with a copy of its current storm water permit tracking system (or a list of all new and inactivated storm water permits) semiannually by April 30 and October 31. Quarterly, the State will provide EPA a current number of industrial and Phase I and Phase II construction storm water permits (October 31, January 31, April 30, and July 31)."

"The State will update the State Enforcement Response Guide (ERG) to include storm water within six months of EPA's final storm water ERG."

"If the State has/will join EPA in a national enforcement case, it will agree to inspect an agreed upon subset of new sites after the consent degree is final. The agreed upon subset will be memorialized in the State's Inspection Plan.

3. Concentrated Animal Feeding Operations (CAFO)

- States should continue to implement and update as necessary, based on the 2008 Final CAFO rule and the collaborative annual work plan, state-specific CAFO compliance and enforcement strategies and conduct compliance assistance and enforcement as appropriate.
- States should submit by December 31, a CAFO inventory and inspection status report explaining the progress made towards inspecting CAFOs and its progress toward inventory development. Region 8 will share with States information gathered through national CAFO inventory efforts (i.e. satellite imagery, flyovers, inspections, and database reviews). Each state should agree to inspect permitted CAFOs at least once during the life of its permit. States should also commit to inspecting all unpermitted large CAFOs at least once within the next 5 years to determine whether the facility discharges, and all medium AFOs once to determine if it is a medium CAFO and requires an NPDES permit. Formal enforcement is expected for any large or medium CAFO determined to have discharged. The state should propose a number of CAFO inspections for the PPA to meet this commitment.

- States are encouraged to utilize PCS/ICIS-NPDES for their inventories. However, if States use tracking methods or systems other than PCS/ICIS-NPDES to maintain such an inventory, States will need to coordinate with the Region to ensure accessibility (such as quarterly hard copy reports) of the information, including permit, inspection, and complaint and enforcement data. States shall submit copies of all CAFO

inspection reports and enforcement actions to the Region 8 NPDES Enforcement Unit. Inspections and enforcement actions at CAFOs with NPDES permits shall be entered into PCS/ICIS-NPDES. Nutrient Management Plans shall also be tracked in PCS/ICIS-NPDES as a compliance schedule item as required by the PCS Policy Statement and its addendums.

- Region 8 will conduct up to four joint/oversight CAFO inspections in each state (in addition to other oversight inspections).

- Each state shall include in its end-of-year report the number of compliance assistance workshops, training sessions, and/or presentations given for AFO/CAFO operators and/or Ag organizations.

Suggested PPA Language
*"The State agrees to implement and update as necessary, based on the 2008 Final CAFO Rule and collaborative annual work plan, state-specific CAFO compliance and enforcement strategies and conduct compliance assistance and enforcement as appropriate. The State will include in its end-of-year report the number of compliance assistance workshops, training sessions, and/or presentations given for AFO/CAFO operators and/or Ag organizations. The State will submit by December 31, a CAFO inventory and inspection status report explaining the progress made towards inspecting CAFOs, and its progress toward inventory development. Region 8 agrees to share with the State any information gathered through national CAFO inventory efforts (i.e. satellite imagery, flyovers, inspections, and database reviews). The State will inspect permitted CAFOs at least once during the life of its permit and all unpermitted large CAFOs at least once within the next 5 years to determine whether the facility discharges, and all medium AFOs at least once to determine if it is a medium CA*FO and requires an NPDES permit*. During FY10, the State commits to inspecting __ permitted CAFOs, ___ unpermitted large CAFOs, and __ medium AFOs to achieve this goal. The State will consider using PCS/ICIS-NPDES for development of its CAFO inventory. Inspections and enforcement actions at permitted CAFOs will be entered into PCS/ICIS-NPDES by the State, and Nutrient Management Plans will be tracked in PCS/ICIS-NPDES as a compliance schedule item as required by the PCS Policy Statement and its addendums. The State will provide quarterly reports to EPA (submitted 10/31, 1/31, 4/30, and 7/31) of any inventory that is maintained outside of PC/ICIS-NPDES for the tracking of CAFO permit, inspection, complaint and enforcement data. This tracking system should include information on CAFOs that have been determined to discharge. The State agrees to submitting copies of all CAFO inspection reports and enforcement actions to the Region 8 NPDES Enforcement Unit. The State agrees to EPA Region 8 conducting up to four CAFO joint/oversight inspections during FY12, in addition to other oversight inspections."*

4. Energy Extraction Sector

- OECA has selected Energy Extraction as a new sector for FY2011-2013. This strategy is currently under development. Once finalized, EPA and states will discuss specific actions for inclusion in the FY12 PPA.

c. Improve Transparency

a. States must ensure that the minimum data requirements identified in the PCS Policy Statement and its addendums are tracked in PCS/ICIS-NPDES. States are encouraged to expand the use of PCS/ICIS-NPDES to track all NPDES compliance and enforcement activities.

b. States which are not using PCS/ICIS-NPDES to track all of its inspection and enforcement activities must report out Mid-Year (April 30, 2012) and in the End-of-Year Report its inspection activities manually. Information that must be reported includes;

i. Number of majors inspected
ii. Number of minors inspected
iii. Number of storm water inspections (specify # of construction phase I and phase II inspections # of industrial inspections and MS4 phase I and II conducted)
iv. Number of CAFO inspections
v. Number of Biosolids inspections (if applicable)
vi. Number of CSO and/or SSO inspections
vii. Number of pretreatment inspections including industrial users

c. For states that are using PCS/ICIS-NPDES to track all activities, EPA will pull inspection and enforcement information from the database at midyear and end-of-year. States must enter all types of inspections in PCS/ICIS-NPDES by April 30 for midyear reporting and October 31, for End-Of-Year reporting.

d. States are encouraged to us the Interim Wet Weather Significant Noncompliance Policy for violations associated with CSOs, SSOs, CAFOs, and storm water.

e. Non-major Facilities Non-compliance Report

- States should include a commitment to submit the annual non-major facilities noncompliance report for the period of 1/01/2011 - 12/31/2011 in accordance with 40 CFR §123.45 (c) by April 30, 2012. States may opt to maintain PCS/ICIS-NPDES and have this information pulled from PCS/ICIS-NPDES in lieu of annual reporting. States should specify in the PPA which option they are choosing for this report.

d. Federal Facilities

a. During FY11, EPA Region 8 may perform inspections at all Federal Facility construction sites that have been awarded contract dollars for site construction.

e. State EPA NPDES Inspections

a. States should submit a draft inspection plan for FY12 (October 1, 2012 -September 30, 2013) by August 1, 2012. EPA will provide comments by August 15, 2012. States should submit a final inspection plan no later than September 1, 2012. When developing the annual State/EPA NPDES inspection plan, States should address national, regional, and State priority areas and sectors which are applicable to the state.

b. States must maintain an effective inspection program in each of the water program areas. States should continue implementing the NPDES Compliance and Monitoring Strategy in FY12. The inspection plan should clearly outline how it is complying with the provisions of the strategy, including a detailed description of how its inspection commitments for both the traditional NPDES core program and national enforcement initiatives will be allocated in FY12. Minimum numbers of inspections for the core programs and priority areas are identified in the Compliance Monitoring Strategy.

c. EPA will conduct up to 6 oversight inspections in each state. These oversight inspections will be conducted to support baseline and targeted oversight, as well as the State Review Framework (SRF) review. The oversight inspections may be conducted by either: 1) accompanying state inspectors during an inspection or 2) by EPA conducting an independent inspection at the same facility at a later date to verify the state findings. EPA may also conduct additional oversight inspections in the national and regional enforcement initiative areas. EPA will target facilities for oversight inspections with states.

f. States should agree to periodically submit to EPA copies of:

- Final settlement agreements (or state equivalent to that type of document),
- The State's penalty calculations including justifications for adjustments and economic benefit calculations for state enforcement actions concluded during the fiscal year
- A description of any supplemental environmental projects included in state enforcement actions concluded during the fiscal year.

g. 404/402 Enforcement Actions

a. In the interest of maximizing resources, states will agree to EPA being the lead enforcement agency on all 404 enforcement actions that have associated 402 violations, except where EPA determines combined cases may not be in the best interest of the litigation.

C. Safe Drinking Water Act (SDWA)

I. Microbial Rules

1. By November 15, 2011, provide to EPA a list of all systems that are required to filter under the SWTR, but are not yet filtering. Additionally, report those violations to SDWIS-Fed. For those still on compliance schedules, provide the schedule from the enforcement document. If any systems are not under compliance schedules, for each system provide a rationale and the proposed state action and time frame for securing an enforceable compliance schedule.

2. By November 15, 2011, provide to EPA a description of any additional actions and the time frames for completing assessments of groundwater under the influence of surface water, and the systems for which such assessments need to be completed.

II. New Rules

Region 8 does not foresee any new rules for which states do not have primacy in FY 2012, which may necessitate federal enforcement actions. However, if the situation exists in which a state does not have primary enforcement authority for any rule, cooperate with EPA in identifying water systems and violations for which EPA may need to issue enforcement actions.

III. SDWA Enforcement

From OECA NPM Guidance:
"The ERP directs that if a PWS reaches an ETT score of 11 or higher before its violations are resolved, that PWS will be considered a priority system that must either return to compliance or receive formal enforcement action within six months of having reached a score of 11. It is OECA's expectation that primacy agencies will simultaneously be working to reduce their backlog of systems that have already been at a score of 11 or higher for more than 6 months. As a longer term goal, primacy agencies are encouraged to address violations at non-complying PWSs before

they become priority systems. A quick response to SDWA violations decreases the risks to public health and allows primacy agencies more flexibility as they work with PWSs to achieve sustained compliance. By focusing resources on PWSs in this way, the ERP helps ensure those PWSs return to compliance in a timely manner."

1. Annotate the quarterly Enforcement Targeting Tool (ETT) list created by the Enforcement Response Policy (ERP) by indicating the State actions planned for each identified priority ETT system, the projected time frame for such actions, and other relevant information that helps EPA evaluate candidates for federal enforcement. Return the annotated list to EPA within 30 days.

2. Address all priority ETT systems (through formal enforcement or appropriate return to compliance) within 6 months of their being identified as priorities, with the goal of taking action before systems reach the priority status.

3. State enforcement escalation policy:
   EPA encourages Region 8 states to update their enforcement escalation policies to ensure that all violations receive a state response, and that enforcement priorities are addressed in a timely and appropriate manner.

IV. SDWA Oversight

1. The following commitments will need to be made by the States in order for EPA to conduct Enforcement Oversight:
   a. Cooperate with EPA and provide access to State PWS files and data for EPA's on-site enforcement review at the State office and UEOS evaluation
   b. Upload all enforcement actions and applicable return to compliance codes into SDWIS-Fed quarterly.
   c. Additional State-specific language will be discussed during the negotiation of the Agreement, in accordance with results of the enforcement program's Uniform Enforcement Oversight System or End of Year Report.

C. Resource Conservation and Recovery Act (RCRA)

a. Mineral Processing and Mining Priority:
   1. The Region will continue to work with HQ and the State to define the anticipated universe for Mineral Processor and Mining priority inspections.

b. Additional State-specific language will be discussed during the negotiation of the Agreement in accordance with results of the enforcement program's State Review Framework.

c. For facilities with significant non-compliance as defined in the Agency's Enforcement Response Policy, States will need to enter SNC status in RCRAINFO and address SNC facilities through appropriate enforcement follow-up. The Region will review SNC facilities on a quarterly basis and discuss with the State enforcement strategies to address longstanding non-compliance. A written report of efforts to address SNC facilities and return them to compliance will be prepared.

d. Core Program Requirements

    a. Treatment, storage and disposal facilities: Inspect at least once every two years each operating treatment, storage and disposal facility, as required under SWDA §3007(e), i.e., 50% of TSDF universe annually.
    b. Generators (LQGs): Annually inspect at least 20% of the large quantity generator universe, so that the entire universe is inspected in five years. The large quantity generator universe is the total number of generators that reported in the most recent biennial report.

        - If inspection coverage is not expected to be provided for 20% of LQGs on an annual basis, the states must provide an explanation that should include the following

            a. Information on how the RCRA compliance monitoring resources will be redirected (e.g., national priority facilities, state priority facilities, never-inspected SQGs.
            b. How LQGs will otherwise be monitored (e.g., file reviews, watch list).
            c. For states proposing to redirect resources to never-inspected SQGs, information that shows no un-inspected LQGs in RCRAInfo (not including facilities that notified in the last five years).

        - Because inspections at LQGs generally require more resources than an inspection at an SQG, inspection tradeoffs - the number of SQGs substituted for LQGs - should be at a 2:1 or greater ratio. As alternative approach to this substitution scheme is described in the 2009 NPM guidance and will be discussed and evaluated with the State if requested.

Suggested PPA Language

"The State commits to implement and provide to EPA by November 15th, an inspection plan which meets the requirements of the Core Program with emphasis on never inspected LQGs, citizen complaints, and national priorities. Financial responsibility is a component of this inspection requirement."

Region and State will project the number of high priority open dumps to be investigated and/or inspected to determine the appropriateness of enforcement to address specific incidents of illegal dumping in Indian country. Regions will commit to investigating 10% of the identified high priority open dumps using OECA's targeting strategy, developed in FY2010.

For non-BIA schools in Indian country, Region and State will project the number of on-site compliance assistance visits designed to ensure the proper and compliant treatment, storage and disposal of hazardous waste.

c. Federal Core Program Requirements

- State or Local Government Operated Facilities: Annually inspect each treatment, storage or disposal facility operated by states or local governments as required under SWDA §3007(d)
- Treatment, Storage and Disposal Facilities: Annually inspect at least 2 TSDs per state.
- Generators (LQGs):
    a. Annual inspect at least 2 generators per state. The region may perform the inspections in the following areas:
        1. national priority sectors,
        2. to support state referrals,
        3. to address illegal recycling,
        4. entities with violations in more than one state,
        5. environmentally sensitive environments,
        6. areas subject to environmental justice concerns,
        7. and particularly recalcitrant violators.

Suggested PPA Language
"The Region commits to work with the State to identify 2 TSDFs and 6 LQGs which the Region will inspect as lead. The LQGs will be identified from the national priority sectors, illegal recyclers, entities with violations in more than one state, environmentally sensitive environment, unpermitted surface impoundments, coal combustion waste facilities, areas of environmental justice concerns and particularly recalcitrant violators. Twenty percent (20%) of these inspections should be in Indian Country. When the universe of TSDFs and LQGs is very small a lesser number of Regional lead inspections will be negotiated. The Region commits to inspect, State or Local government TSDFs as required by Statute. At least 20% of the LQG universe should be covered by combined federal and State inspections unless an alternative plan is approved under the RCRA CMS".

d. Financial Assurance

- OECA has identified financial assurance as a national priority. This will include the review of
- Treatment, storage and disposal ("TSD") as well as corrective action facility files to ensure that the RCRA owner/operator has submitted acceptable financial assurance documentation as required in the respective permit or enforcement document.

- File reviews at the State offices, specifically to identify operator compliance with State RCRA regulations which comport to C.F.R. 264 Subpart H. The States will participate in this review process by making available their operator files, permits and enforceable documents to Region 8 staff. Determinations of operator compliance are on going, and follow-up on identified concerns will be made by the States and/or Region 8 using standard compliance or enforcement tools.

Suggested PPA Language
"The State and Region 8 will work together to move closure/post closure and corrective action facilities to compliance with financial assurance requirements through the development of enforcement cases which may be taken by either the State or EPA. Region 8 will be the lead for entities with facilities in more than one state. Regions must commit to review at least four (4) financial test and/or corporate guarantee submissions per year for compliance with the closure and post-closure regulations. Regions may instead choose to review other types of financial assurance instruments for facilities that did not have a financial assurance review during the national enforcement priority. The reviews should be formal Financial Records Reviews..

For 100% of the financial test submissions (corrective action facilities)received each fiscal year with cost estimates over $5 million, determine whether the submission is in compliance.

DATA: Maintain RCRAInfo database
Regions are to coordinate with State to review at least (2) financial test and/or corporate guarantee submissions per year in each State. Reviews should be formal Financial Records Reviews and take place soon after the submissions are received.

FY 2012

Office of Enforcement and

Compliance Assurance (OECA)

Final

National Program Manager (NPM) Guidance

April 30, 2011

Publication Number:
300F1105

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EXECUTIVE SUMMARY

A. Program Office

This guidance applies to the Office of Enforcement and Compliance Assurance (OECA), all Environmental Protection Agency (EPA) regional enforcement programs, and States and Tribes implementing EPA-approved inspection and enforcement programs[1]. OECA designs, develops, implements and oversees national enforcement programs, while the regional offices work with States, Tribes, and others to implement these programs. The OECA *National Enforcement Program Managers Guidance* (NPMG) for fiscal year (FY) 2012 describes how EPA should work with state and tribal governments to enforce environmental laws that protect and improve the quality of the Nation's environment and public health.

B. Introduction/ Context

EPA's national enforcement and compliance assurance program is multi-media in scope and breadth. The national program maximizes compliance with ten distinct federal environmental statutes using a variety of tools, including civil and criminal enforcement, compliance assistance, incentives, and monitoring, as well as other strategies to improve compliance, such as publication of compliance information. OECA implements a total of 28 separate program areas dealing with prevention and control of air pollution, water pollution, hazardous waste, toxic substances, and pesticides. The statutory and regulatory requirements of these programs apply to a diverse universe of regulated entities. EPA works closely with the states to assure that enforcement programs achieve the protections of the environmental laws and provide a level playing field for responsible businesses.

The majority of the work in the FY 2012 NPMG is accomplished under Goal 5 - "Enforcing Environmental Laws" in the FY 2011-2015 EPA Strategic Plan (http://www.epa.gov/planandbudget/strategicplan.html. Goal 5 of the Strategic Plan addresses how EPA will address pollution problems through vigorous and targeted civil and criminal enforcement, promote compliance and deter violations by achieving set enforcement goals, including those for national enforcement initiatives with special emphasis on potential environmental justice concerns and those in Indian country.

The FY 2012 NPMG is organized to describe, for each statutory authority, the national enforcement and program office priorities, and other key enforcement actions to achieve EPA's enforcement goals.

C. Program Priorities

OECA's work aligns with and implements the Administrator's priorities in the following ways:

[1] EPA implements programs in states and Indian country until EPA approves the state or Tribe to implement the inspection and enforcement program.

- Taking Action on Climate Change: Enforcement supports the Agency's climate strategy by recognizing reductions of global warming pollution in settlements of enforcement actions. OECA will be working to support the integrity of the monitoring and reporting system for global warming pollution by assuring compliance with the greenhouse gases reporting rule.

- Improving Air Quality**:** Enforcement helps improve air quality in communities by targeting large pollution sources, especially in the utility, acid, cement and glass industries, and taking aggressive action to bring them into compliance, which may include installing controls that will benefit communities and improve emission monitoring. OECA is working closely with the Office of Air and Radiation to reduce toxic air pollution, through protective enforcement, permitting and standards, especially in communities that are disproportionately affected by pollution now. OECA will continue to work with States and Tribes to improve monitoring of compliance with air pollution standards and make sure that action is taken against serious violations that affect community air quality.

- Assuring the Safety of Chemicals**:** As the Agency steps up its review of chemical safety and pushes for reform, OECA will work closely with the Office of Chemical Safety and Pollution Prevention to achieve its goals. The enforcement program will take action when we find violations of standards for high-concern chemicals.

- Cleaning Up Our Communities**:** Enforcement ensures that parties responsible for contamination step up to their cleanup responsibilities. By ensuring that the polluter pays whenever possible, OECA's efforts result in more cleanups, which protect more communities from exposure and returns properties to productive use. OECA will also use enforcement to spur cleanup at RCRA corrective action sites where the cleanup progress is stalled.

- Protecting America's Waters**:** OECA is revamping the water enforcement program to focus on the problems that are the biggest threat to the nation's waters. At the same time, OECA will increase oversight of the States and work to define the shared accountability of EPA, States and Tribes for clean water, working closely with the Office of Water. OECA will improve transparency, to enlist the public in holding sources and government accountable.

- Expanding the Conversation on Environmentalism and Working for Environmental Justice: In all OECA's enforcement work, as described above, OECA can help protect communities by targeting enforcement in areas where we find serious noncompliance and where communities face multiple pollution threats. OECA works with other federal agencies to make sure environmental justice considerations are included in their decision-making process as they prepare environmental analyses (environmental impact statements or environmental assessments) under the National Environmental Policy Act (NEPA). OECA also will make available more understandable information on facility compliance and government response, so that people have the information they need to take action to improve their own communities.

- Building Strong State and Tribal Partnerships: EPA shares accountability with States and Tribes for protecting the environment and public health. With the current economic challenges, it is important that EPA and its partners work efficiently and effectively to do the most we can with the resources we have. At the same time, OECA will strengthen oversight of States that implement federal environmental programs, and support States that take strong enforcement action to protect their citizens by making sure that we hold all States to a comparable standard.

OECA's overall enforcement goals for FY 2012 are to:

- Aggressively go after pollution problems that make a difference in communities. EPA will use vigorous civil and criminal enforcement that targets the most serious water, air and chemical hazards; and advance environmental justice by protecting vulnerable communities.
    - Clean water
        - The Clean Water Act action plan commits EPA to revamp enforcement and work with permitting to focus on the biggest pollution problems, such as
            - Getting raw sewage out of the water
            - Cutting pollution from animal waste
            - Reducing polluted storm water runoff
        - Assure clean drinking water for all communities, including in Indian country
        - Clean up great waters that matter to communities, e.g, Chesapeake Bay
    - Clean air
        - Cut toxic air pollution in communities
        - Reduce air pollution from largest sources, including coal-fired power plants, cement, acid and glass sectors
    - Climate and clean energy
        - Assure compliance with Greenhouse Gas Reporting Rule
        - Encourage greenhouse gas emission reductions through settlements
        - Target energy sector compliance with air, water and waste rules
    - Protect people from exposure to hazardous chemicals
        - Prevent releases of hazardous chemicals that threaten public health or the environment
        - Press for prompt cleanup of hazardous sites in communities, ensuring that the polluter pays
        - Reform chemical management enforcement and reduce exposure to pesticides, focusing on specific areas aimed to help achieve clean water, clean air, and climate and clean energy, and to protect people from exposure to hazardous chemicals.

- Reset our relationship with States to make sure we are delivering on our joint commitment to a clean and healthy environment.
    - Shared accountability
        - Make joint progress with States and Tribes toward clean air and water goals, and protection from exposure to hazardous chemicals

        - Work toward shared focus on protecting vulnerable communities
    - Strengthened oversight
        - Assure strong and effective State enforcement of federal environmental laws
        - Press for consistent enforcement across States and Regions, ensuring fairness and a level playing field
    - Establish new model for shared accountability and strengthened oversight, starting with water
        - Build focus on highest priority problems into grants, enforcement and permitting agreements
        - Define clear expectations for state performance
        - Take federal action where minimum expectations are not met

- Improve transparency
    - Make meaningful facility compliance information available and accessible using 21st century technologies
    - Hold government accountable through public information on state and federal performance
    - Promote better federal environmental decisions and public engagement through NEPA

To help implement these enforcement goals, OECA selects a limited number of National Enforcement Initiatives based upon significant environmental risks and noncompliance patterns. In FY 2010, EPA re-examined the existing initiatives to look for opportunities to clarify goals and measures, more accurately identify universes of sources, and, where necessary, to change the focus of an Initiative. In addition, EPA considered candidates for new National Enforcement Initiatives. After consulting with EPA programs and Regions, States, Tribes, and the public, OECA adopted the following National Enforcement Initiatives for 2011 through 2013. More information on each is found in the media sections of this guidance:

- Keeping raw sewage and contaminated stormwater runoff out of our waters
- Cutting animal waste to protect surface and ground waters
- Reducing widespread air pollution from the largest sources, especially the coal-fired utility, cement, glass, and acid sectors
- Cutting toxic air pollution that affects communities' health
- Assuring energy extraction sector compliance with environmental laws
- Reducing pollution from mineral processing operations

Strategies to implement these initiatives are developed by regional and headquarter teams and include goals, measures, and options for innovative approaches.

D. Achieving Compliance for National and Regional Priorities

EPA and states need to consider how to best use the mix of compliance tools to address all the regulated entities contributing to the environmental problem. The strategic use of the tools along with the identification of partners to help implement them will allow for the efficient use of Agency resources and effective approaches to solving large scale issues.

Strategic use of the tools will benefit EPA and states by: 1) targeting limited inspection and enforcement resources on the bad actors; 2) building capacity and coordination across partners; and 3) expanding governments' presence and demonstrating governments' commitment. More information on the use of integrated strategies is found in the Guide for Addressing Environmental Problems: Using an Integrated Strategic Approach (March 2007) http://www.epa.gov/compliance/resources/policies/assistance/index.html

Program Reviews

OECA monitors regional and state activities in a set of annual commitments at mid-year and at the end of a fiscal year based upon Region and State results entered in OECA databases, the Annual Commitment System (ACS), and data collected in the implementation of national enforcement initiatives. In addition, OECA senior managers conduct an annual program review of each regional office. The performance expectations and activities outlined in this guidance are the starting point from which headquarters and the regional offices engage to discuss the management of program activities and the distribution of resources. These discussions result in regional commitments for a specific level of activity and an agreed-upon approach between the regions and the national program manager for achieving performance expectations for the fiscal year.

Regional Priorities

EPA Regions may also have priorities that are specific for a particular environmental situation that may not affect other regions. Some problems cross regional boundaries and regions are working together to address them. For example, in response to the President's May 12, 2009, Executive Order 13508—*Chesapeake Bay Protection and Restoration*, Regions 2, 3, 4, and 5 are working with OECA to address nitrogen deposition to the Bay from large industrial air sources of NO_x. The Regions will build on work already begun under the national enforcement initiatives to evaluate the compliance of power plants and other industrial sources in the Chesapeake Bay air shed emitting more than 1000 tons of NO_x per year. Any resulting enforcement actions would seek to achieve significant NO_x reductions through complying actions, as appropriate. In addition, Region 3 will take steps to evaluate the potential impacts on the Bay of ammonia (NH_3) emissions from concentrated animal feeding operations (CAFOs).

E. Cross Cutting Strategies in the FY2011-2015 Strategic Plan

As part of the FY 2011-2015 Strategic Plan, the Agency has identified five cross-cutting fundamental strategies designed to change the way the Agency works and delivers environmental and human health protection. OECA's NPM guidance directly supports three of the five cross-cutting strategies by instructing the regions to undertake activities in FY2012 that contribute to the cross-cutting strategies' goals. Specific examples in the FY2012 guidance include the following:

Expanding the Conversation on Environmentalism

- Data regarding state assessments, priorities and performance under the Clean Water Act (CWA) should be made public, where possible, on a regular basis in a manner easily understood and used by the public;
- Compliance data should distinguish State information from Indian country information;
- Information should be made available to communities, including Native American and Alaskan Natives, who lack access to the internet;
- Criminal Enforcement program will continue to develop its use of new outreach methods such as Facebook, Twitter and mobile applications to encourage the public's reporting of potential violations and to provide leads through the fugitives website http://www.epa.gov/fugitives/.

Strengthening State, Tribal and International Partnerships

- Regions will continue to implement the CWA Action Plan in FY2012 by collaborating with states to address NPDES permitting, compliance monitoring, and enforcement activities, including work-sharing;
- A majority of program narratives in the FY2012 guidance contain specific activities regarding state relationships;
- Regions should consult, as appropriate, with potentially impacted tribal governments when conducting inspections and addressing noncompliance at tribal and non-tribal facilities in Indian country.

Working for Environmental Justice (EJ) and Children's Health

- Regions are directed to use the Agency's environmental justice tools and methodologies to focus enforcement and compliance efforts in communities overburdened by exposure to environmental risks, including minority and low-income communities, as well as those with greater concentrations of sensitive populations.
- Specific OECA EJ performance expectations, which include children's health as appropriate, are discussed in Section II of this guidance.

OECA's national enforcement initiatives address some of the more complex pollution problems; especially those confined to a particular sector or source type, and can have positive impacts on children's health. For example:

  - Reducing widespread air pollution from large sources, especially the coal-fired utility, cement, glass, and acid sectors can potentially lessen adverse health effects such as asthma, respiratory diseases and premature death in communities overburdened by exposure to environmental risks and vulnerable populations, including children.
  - Preventing animal waste from contaminating surface and ground waters reduces children's exposure to disease-causing pathogens, nutrients, or other contaminants which have potential adverse health effects
  - Addressing the human health and environmental threats from of mining and mineral processing can lead reduced exposure to asbestos and lead poisoning in children.

- In addition to the national initiatives, OECA reduces risks to children through the following:

- Requiring Local Education Agencies (LEAs) to inspect for asbestos
- Monitoring and enforcement to promote compliance with lead based paint (LBP) rules to advance the goal of eliminating and preventing LBP hazards, which are the primary cause of childhood lead poisoning.
- Monitoring and enforcement to prevent the illegal importation of pesticides which have been linked to poisoning of children

F. Significant Changes from FY2011

The Office of Enforcement and Compliance Assurance's FY 2012 guidance continues to focus on the Administrator's and Assistant Administrator's goals, and on aligning enforcement and compliance priorities with those of the other EPA national program managers. As in FY 2011, the FY 2012 guidance is organized to describe the specific expectations for Regions that implement the Assistant Administrator's priorities and, explains how the enforcement program supports the priorities of other EPA national programs. There are some notable changes in specific programs contained within this guidance and can be summarized as follows:

Clean Water Action Plan: The FY12 guidance contains more specific instructions for the regions and states on how to implement the Clean Water Action Plan such as replacing existing paper reporting with electronic reporting, creating a new compliance paradigm, retooling key NPDES permitting and enforcement activities, and conducting comprehensive and coordinated permitting, compliance, and enforcement programs.

Wetlands Program: The FY12 guidance sets expectations for the regions to participate in a Section 404 Enforcement Strategy pilot program to improve coordination and communication between EPA and the Corps of Engineers to improve management of the wetlands protection program.

Oil Spills Prevention: In light of the events of the British Petroleum oil spill, the FY12 guidance has been expanded to provide more detailed instructions on the compliance and enforcement activities of an effective oil spill program.

Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) Program – Each year regions are asked to place special emphasis on key focus areas within the FIFRA program. In FY12, an optional focus area has been included to provide flexibility to the regions on where to focus their efforts. This flexibility allows for more opportunities to support the Office of Chemical Safety and Pollution Prevention's program priorities.

G. Contacts

For general questions or comments on the *OECA National Program Managers Guidance* or our Annual Commitments please contact:

Lisa Raymer
Office of Enforcement and Compliance Assurance
Office of Compliance
Planning, Measures, and Oversight Division
1200 Pennsylvania Ave., NW, M2221A
Washington, DC 20460
Email: Raymer.Lisa@epa.gov

SECTION I: OECA GUIDANCE DEVELOPMENT AND FEEDBACK PROCESS

OECA has structured the NPM Guidance to focus on the performance expectations of the national enforcement program in terms of 1) achieving the Enforcement Goals, 2) making progress in attaining compliance within the national enforcement initiative areas and 3) supporting the EPA program offices in achieving their environmental and public health goals. EPA will post the FY 2012 NPM draft Guidance to allow Regions, States, Tribes, and others to review and comment on the draft. In the past, OECA has received comment from Regions, States, Tribes, and other stakeholders. OECA will respond to the comments and incorporate changes, as needed, in the final documents. The final guidance and a Response to Comments Summary will be posted on the Internet showing the action taken in the final guidance as a result of comments.

SECTION II: SPECIFIC ENVIRONMENTAL JUSTICE PROGRAM PERFORMANCE EXPECTATIONS

OECA plays a dual role in setting performance expectations for environmental justice. First, OECA oversees national and regional enforcement programs. In this role, OECA ensures that facilities in communities overburdened by environmental problems are complying with the law. OECA aggressively applies regulatory tools to protect vulnerable communities, enlists partners to meet community needs, and fosters community involvement in EPA's decision-making processes by making information available.

Second, OECA is the National Program Manager for the Environmental Justice (EJ) Program. The EJ Program facilitates headquarter and regional efforts to achieve measurable environmental or public health benefits/results for communities overburdened by environmental problems.

OECA and Region 5, as Lead Region for FY2011-2013, are implementing the Strategies and Activities outlined in Advancing Environmental Justice through Enforcement and Compliance (EJ 2014 Plan), one of the five cross-cutting areas identified for Agency-wide action in EPA's Plan EJ 2014. OECA's goals under this Plan are to fully integrate consideration of EJ concerns[2] into the planning and implementation of program strategies, case targeting strategies, and development of remedies in enforcement actions to benefit these communities. OECA also plans to accelerate efforts to communicate more effectively with vulnerable and overburdened communities about enforcement actions and program activities.

[2] EPA defines "environmental justice" as the *fair treatment* and *meaningful involvement* of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. EJ concerns with respect to "fair treatment" arise where there are actual or potential disproportionate impacts on minority, low-income, or indigenous populations that exist prior to or that may be created by a proposed action. EJ concerns with respect to "meaningful involvement" arise where there is an actual or potential lack of opportunities for minority, low-income, or indigenous populations, or tribes, to effectively and appropriately participate in decision-making. These terms are discussed in more detail in Part I of EPA's *"Interim Guidance on Considering Environmental Justice during the Development of an Action"* (http://www.epa.gov/compliance/ej/resources/policy/ej-rulemaking.html).

OECA has developed five strategies for Advancing Environmental Justice through Enforcement and Compliance:

1. Advance EJ goals through selection and implementation of National Enforcement Initiatives.
2. Advance EJ goals through targeting and development of compliance and enforcement actions.
3. Enhance use of enforcement and compliance tools to advance EJ goals in Regions' geographic initiatives to address overburdened communities.
4. Seek appropriate remedies in enforcement actions to benefit vulnerable and overburdened communities and address EJ concerns.
5. Enhance communication with affected communities and the public regarding EJ concerns and the distribution and benefits of enforcement actions, as appropriate.

For FY2012, OECA will address our EJ 2014 Plan goals through the following performance expectations.

1. *Advance EJ goals through Selection and Implementation of National Enforcement Initiatives*

OECA will continue to look for opportunities to address EJ concerns as it implements the National Enforcement Initiatives for FY2011-13. A "Strategy Implementation Team," consisting of OECA headquarters and regional representatives, is responsible for developing implementation strategies and performance measures for each of the National Enforcement Initiatives. Each initiative's strategy will consider how EJ concerns can be addressed in carrying out its activities, *e.g.* by giving priority in case selection to overburdened communities affected by the pollution problems the Agency seeks to address in each of the initiatives. In developing remedies in initiative's enforcement cases, the Agency will seek judicial and administrative remedies that will reduce or eliminate pollution that may have a disproportionate impact on minority, low-income or indigenous populations.

2. Advance EJ Goals Through Targeting and Development of Compliance and Enforcement Actions

OECA and the Regions will place a high priority on addressing EJ concerns as the specific targeting and case selection strategies for both National Enforcement Initiative and other enforcement cases are developed. As discussed above, the Strategic Implementation Teams for each Initiative have identified opportunities to protect and benefit overburdened communities when selecting and developing specific cases to achieve the Initiative goals. For example, when selecting specific CAFO facilities for enforcement action, priority may be given to facilities that are impacting or threatening the drinking water supplies of poor rural communities. OECA and the Regions will also give specific consideration and priority to overburdened communities when selecting enforcement actions to address other important compliance problems, regardless of whether they are part of an Initiative. For example, in selecting enforcement actions to address violations of drinking water standards, we will give high priority to addressing violations at water supply systems that serve poor and tribal communities, as well as children, one of our most vulnerable populations.

In FY2012, OECA will continue to use the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT) or similar screening tools and other information, e.g., community input, to support targeting of enforcement actions and to enhance performance reporting. In addition to OECA's efforts to develop screening tools for use in the enforcement and compliance program, the Agency's Information Tools Development Workgroup is undertaking a larger effort to develop guidance on identifying areas of potential EJ concern as a separate effort under EPA's Plan EJ 2014. It will be important to ensure that OECA's guidance to enforcement case teams is consistent with the approaches developed by the Agency-wide EJ Screening Committee. Therefore, upon completion of the Screening Committee's work, OECA will review its guidance to ensure that it is consistent with the final Agency decisions based on the EJ Screening Committee's work.

- Regions may be asked to support development of tools to track and report on enforcement actions and results that impact communities with potential EJ concerns, in ICIS, according to the instructions and pilot to be developed by the EJ Tracking and Reporting Workgroup.

3. Enhance Use of Enforcement and Compliance Tools to Advance EJ Goals in Regions' Geographic Initiatives to Address Overburdened Communities

Regions have developed, and continue to develop, integrated strategies to focus on particular geographic areas in their Regions with overburdened communities that are disproportionately affected by environmental problems. Beginning in 2008 for example, each Region identified a "Showcase Community" to focus efforts to address EJ concerns. The Regions used integrated strategies for this purpose that included the full range of EPA's tools, and a number of these projects included use of enforcement and compliance assurance tools . Under this Strategy, the Regions will ensure that they use their enforcement and compliance assistance tools effectively to identify and address environmental problems in areas of EJ concern that are caused or made worse by violations of federal environmental laws. For example, EPA Regions 3, 4 and 5 are leading a geographic enforcement initiative focused on Huntington Port, which was selected in part because screening analysis indicated a high potential for EJ concerns. This initiative incorporates enforcement and compliance assistance to reduce pollution and increase compliance. It also includes workshops to build the community's capacity to help ensure the long-term protection of the environment and public health.

- Regions, together with state and other partners as appropriate, should evaluate facility compliance in EJ communities selected for strategic focus. These evaluations should be targeted using the best available data and methods in light of the overall objectives of EPA's enforcement and compliance assurance work. In this way, community-focused initiatives will complement the national enforcement initiatives and other sector-based and program-specific enforcement activities, meeting OECA's goal of strategically using limited enforcement resources to address the most significant issues first.
- Regions should tailor compliance evaluation and enforcement actions as part of integrated strategies to maximize EPA's ability to gain environmental benefits in overburdened communities. For example, this could include use of multi-media

inspections and/or process inspections to comprehensively address potential impacts from violations at a given facility.

- OECA and the Regions will consider and use compliance assistance activities to effectively reach large numbers of small sources with environmental violations that have significant local impacts on overburdened communities. Compliance assistance tools are particularly appropriate, at least as an initial compliance effort, when widespread violations are found among small businesses, which often have limited resources and less ability than major industrial facilities to understand and comply with the requirements of federal environmental regulations. EPA and states have often been successful in improving small businesses' compliance with environmental regulations through focused outreach and education efforts.

4. Seek Appropriate Remedies in Enforcement Actions to Benefit Vulnerable and Overburdened Communities and Address EJ Concerns.

OECA and the Regions, and the Environmental Enforcement Section of the U.S. Department of Justice (DOJ) are jointly heightening their focus in civil enforcement cases on potential options to obtain meaningful environmental benefits to specific overburdened communities impacted by violations of federal environmental laws. These efforts go beyond traditional injunctive relief to stop illegal pollution, to provide for mitigation of the environmental harm caused by illegal pollution and, where appropriate and agreed to by defendants, Supplemental Environmental Projects (SEPs) to provide benefits to communities. For example, in a case involving illegal discharges of pollutants from a facility that damaged a tribal fishing area, the relief ordered (in addition to stopping the illegal discharges) included restocking the fishing ground. EPA has also been successful in obtaining SEPs from defendants to retrofit diesel school buses, to reduce the air pollution children are exposed to. We will continue and accelerate these types of efforts to reduce pollution burdens that have a disproportionate impact on minority, low-income or indigenous populations.

In addition to the benefits that can be obtained for overburdened communities through judicial and administrative enforcement actions, there may be other, parallel opportunities in a particular situation and community to obtain additional benefits for the community through cooperation with other federal agencies, state or local governments, and/or the business community. For example, the U.S. Department of Housing and Urban Development may be able to provide housing assistance or other community benefits in a "brownfields" area where EPA has taken enforcement action to clean up environmental contamination. State or local governments may have projects or grant funding that can be used to improve the community's infrastructure or environment in an area that is also the focus of EPA compliance or enforcement action. In situations where air emissions from multiple industrial facilities continue to adversely affect community health despite their compliance with emission limitations, some business communities may be willing to work together to take voluntary action to further reduce the emissions that adversely affect the community. Examples of such voluntary actions include: a health clinic established and operated together with local, state and community members; a household hazardous waste collection drive; a local company voluntarily agreeing to post compliance monitoring information directly on a public website to allow community members to check on compliance; "good neighbor

agreements" between local companies and communities to address facility impacts not regulated by a permit or other law. EPA will identify specific opportunities, in cases or regional geographic initiatives, to work with other federal agencies, state and local governments, and/or the business community to complement and leverage benefits resulting from enforcement activities. EPA will document and share recommendations and best practices for taking action on these opportunities.

5. Enhance Communication with Affected Communities and the Public Regarding EJ Concerns and the Distribution and Benefits of Enforcement Actions, As Appropriate

OECA and the EPA Regions with the Department Of Justice will increase their efforts to communicate with affected communities and the public about enforcement strategies and actions that may affect vulnerable and overburdened communities. We recognize that communities have a legitimate need to be informed and to understand the federal government's enforcement activities to protect their environment, and to have their voices heard when solutions are being considered to redress environmental problems caused by violations of federal environmental laws that affect their community. As OECA implements Plan EJ 2014, we commit to increase our outreach to communities and to provide more information about environmental problems caused by failure to comply with federal environmental laws, our efforts to address those problems, and available judicial and administrative solutions to those problems that can address the communities' concerns and needs.

At the same time, it is important for communities to understand the legitimate and essential need to protect the confidentiality of enforcement activity when a case is under development and in settlement negotiations. This is essential to assure that effective enforcement, and its ultimate benefits for the community, will not be undermined and adversely affected by premature disclosure of confidential enforcement information. While this consideration will necessarily limit the amount and kind of information that EPA is able to share with the community at various stages of enforcement activity, we are committed to sharing as much information as possible to enable communities to be informed and to have their voices heard in the determination of appropriate resolutions for violations of federal environmental laws that affect communities.

While increased communication efforts are important, it is no less important to receive input from communities on potential violations. We will continue to invite tips and complaints, including through such means as OECA's on-line reporting badge and the EPA fugitives webpage.

- OECA and the Regions will review their enforcement dockets to identify communities with EJ concerns that could benefit from enhanced communication and consultation regarding enforcement activities, and provide the communities with additional information (consistent with the confidentiality requirements needed to protect the integrity of enforcement actions).
- OECA and the Regions will also provide opportunities for communities to provide input on EJ concerns and remedies to be sought in enforcement actions that affect their

communities. This information will be provided through EPA's website, local information repositories, and other appropriate means.

- OECA and the Regions recognize that EPA's enforcement processes, *e.g.* the enforcement processes concerning hazardous waste site cleanup that affect communities with EJ concerns, are often complicated and can be difficult for the public to understand and to follow. To increase communities' ability to understand our enforcement processes, we will continue to improve the accessibility to communities of the information provided on EPA's website, develop and make available fact sheets to better explain EPA's enforcement process at particular sites, and update for internal EPA use a compendium of "best practices" that will encourage and facilitate EPA employees' efforts to make enforcement information more available to the public. EPA's enforcement actions frequently provide significant benefits to vulnerable and overburdened communities, including reduction of air or water pollution, cleanup of toxic and hazardous waste, and additional community benefits such as diesel bus retrofits and other benefits made available through Supplemental Environmental Projects (SEPs). However, the community is able to appreciate these benefits only to the extent that it is aware of them. Therefore, OECA and the Regions will continue accelerating our efforts to communicate, through press releases, our website and other means, the benefits of our enforcement actions for vulnerable and overburdened communities, consistent with the memo, *"Characterizing the EJ Benefits Achieved in Enforcement Actions"* issued in 2011.

SECTION III: KEY PROGRAM PRIORITIES AND STRATEGIES TO ADDRESS ENVIRONMENTAL PROBLEMS FROM AIR POLLUTION

A. Clean Air Act (CAA)

OECA addresses air pollution problems through the following CAA programs:

- Part 60 - New Source Performance Standards (NSPS)
- Part 61- National Emission Standards for Hazardous Air Pollutants (NESHAP)
- Part 63 -Maximum Achievable Control Technology (MACT)
    - Maximum Achievable Control Technology (MACT) – major sources
    - Generally Available Control Technology (GACT) – area sources
- New Source Review/Prevention of Significant Deterioration (NSR/PSD)
- Enforcement of State Implementation Plans and plans developed and approved under Section 111(d)
- Title V Operating Permits
- Part 82-Title VI Stratospheric Ozone Protection
- Section 112(r) Prevention of Accidental Releases
- Title II (Emission Standards for Moving Sources)
- Section 129 Solid Waste Combustion

1. Implement National Enforcement Initiatives

The relevant FY 2011 – 2013 national enforcement initiatives for CAA programs are:

Cutting Toxic Air Pollution that Affects Communities' Health: In 1990, Congress identified 189 hazardous air pollutants (HAPs) that present significant threat to human health and have adverse ecological impacts (http://www.epa.gov/ttn/atw/188polls.html). The pollutants are known or suspected to cause cancer and other serious health effects, such as reproductive or birth defects. The threats posed by HAPs may be particularly significant for communities overburdened by exposure to environmental risks, including urban minority and low-income communities, as well as those with greater concentrations of sensitive populations. The CAA and EPA's regulations impose strict emission control requirements (known as "Maximum Achievable Control Technology" or "MACT") for these pollutants, which are emitted by a wide range of industrial and commercial facilities. For FY2011-13, EPA will target and reduce emissions of toxic air pollutants in three areas where the Agency has determined there are high rates of noncompliance: (A) leak detection and repair; (B) waste gas flares; and (C) excess emissions, including those associated with startup, shut down and malfunction. Particular emphasis will be given to emissions at sources that have a significant impact on air quality and health in communities. As part of this effort, OECA will utilize innovative monitoring and evaluation techniques and partner with EPA's Office of Air and Radiation (OAR) and Office of Research and Development.

Reducing Widespread Air Pollution from the Largest Sources, Especially the Coal-fired Utility, Cement, Glass, and Acid Sectors: The NSR/PSD requirements of the CAA require

certain large industrial facilities to install state-of-the-art air pollution controls when they build new facilities or make "significant modifications" to existing facilities. However, many industries have not complied with these requirements, leading to excess emissions of air pollutants such as sulfur dioxide, nitrogen oxides and particulate matter. These pollutants can be carried long distances by the wind and can have significant adverse effects on human health, including asthma, respiratory diseases and premature death. These effects may be particularly significant for communities overburdened by exposure to environmental risks and vulnerable populations, including children. In recent years, EPA has made considerable progress in reducing excess pollution by bringing enforcement actions against coal-fired power plants, cement manufacturing facilities, sulfuric and nitric acid manufacturing facilities, and glass manufacturing facilities. However, work remains to be done to bring these sectors into compliance with the CAA and protect communities burdened with harmful air pollution. Therefore EPA will continue this work as a National Enforcement Initiative for FY2011-2013.

As of January 2, 2011, EPA also began regulating greenhouse gases (GHGs) under its NSR program. EPA will endeavor to ensure these pollutants are also addressed in any process changes or modification that gives rise to NSR requirements.

Assuring Energy Extraction Sector Compliance with Environmental Laws: As the nation expands its search for new forms and sources of energy, there is an urgent need to assure that we develop "clean energy" sources that protect our air, water and land. Some energy extraction activities, such as new techniques for gas extraction, pose a risk of pollution of air, surface waters and ground waters if not properly controlled. For example, an unprecedented acceleration of natural gas leasing and development has led to a significant rise in the level of air pollution throughout the intermountain West. Drilling and fracking activities have led to concerns about ground water pollution and the safety of drinking water supplies in various parts of the country. To address these emerging problems, OECA's energy extraction initiative will focus on efforts to assure that natural gas extraction activities are complying with federal requirements to prevent pollution of our air, water and land. This initiative will be undertaken in particular areas of the country where natural gas extraction activities are concentrated, and the focus and nature of our enforcement activities will vary with the type of activity and pollution problem presented.

2. Link with Top Office of Air and Radiation Priorities

OECA addresses top OAR priorities in the following ways:

- Greenhouse Gases (GHG): OECA continues to support the Agency's climate strategy by recognizing reductions of global warming pollution in settlements of enforcement actions. OECA and OAR will implement a National Implementation Strategy for the Greenhouse Gas Reporting Program. The National Implementation Strategy will provide guidance to Regions on compliance monitoring and assistance activities, in order to establish the appropriate enforcement response to support the integrity of the GHG monitoring and reporting system. As noted above, OECA will also ensure that sources undertaking certain process changes or modification that result in significant GHG emissions go through proper New Source Review permitting.

- Air Toxics in Communities: OECA will address this Agency priority through the 2011 – 2013 National Enforcement Initiative - cutting toxic air pollution that affects communities' health. OECA also is working closely with OAR and ORD to reduce toxic air pollution through standards, permitting, compliance monitoring and assistance activities, and enforcement, especially in communities overburdened by environmental problems.

3. Aggressively Go After Pollution Problems That Make a Difference in Communities

Air pollution moves with the wind and is therefore of great concern to communities both near its source and remotely located. Air pollutants that are emitted closer to the ground, for example as a result of equipment leaks or low stack height, can cause disproportionate exposure for neighboring communities. In industrial areas, these communities frequently have significant low income and minority populations. Serious health effects caused by air pollution include difficulty in breathing, exacerbation of respiratory and cardiac conditions, and cancer.

Regions and delegated state/local agencies and Tribes should:

- Implement programs in accordance with existing national compliance and enforcement policy and guidance (e.g., the CAA Stationary Source Compliance Monitoring Strategy (CMS); the CAA National Stack Testing Guidance, the Timely and Appropriate Enforcement Response to High Priority Violations (HPV Policy); and the Area Source Implementation Guidance to address significant air pollution problems that adversely affect impacted communities by reducing such pollution from the largest sources with special attention directed toward reducing toxic air pollution. Regions should work with delegated agencies/tribes to ensure that they are familiar with national guidance, aware of the flexibilities within the guidance, and implement their programs consistent with the guidance.
- To identify the most important air pollution problems and the most serious violations, use targeting tools and other information, such as the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT), and community input.
- Have a clearly defined process for identifying, targeting, evaluating, prioritizing, and responding to CAA violations.
- Work together to initiate civil and criminal enforcement actions, as appropriate, and whenever necessary to protect communities by addressing and ultimately resolving serious air violations in order to bring sources into compliance.
- Evaluate all violations, determine an appropriate response, and take timely and appropriate actions against facilities determined to have High Priority Violations (HPV).
- Enter data on all federally-reportable violations, not just HPVs, consistent with the 'Clarification Regarding Federally-Reportable Violations for Clean Air Act Stationary Sources" ("2010 FRV Clarification") issued on March 22, 2010.
- Negotiate settlements and track compliance with consent decrees and administrative orders and take all necessary actions to ensure compliance with the terms of federal enforcement actions.
- Utilize compliance assistance, monitoring, enforcement tools and other approaches that are effective in achieving widespread compliance; the appropriate combination and sequencing

of compliance assistance and enforcement tools may vary with the CAA program and the type of regulated industry.

In addition, the Regions should:

- Continue any on-going investigations and initiate new ones, as appropriate. Activities reported as investigations should meet the definition of an investigation as provided in the CMS and minimum data requirements. Regions must review and approve state implementation plans (SIPs) as well as to track the compliance status of sources within various regulatory programs under the Clean Air Act. Both initiated and completed investigations are to be reported in AFS.
- Review Title V permits consistent with national guidance and ensure the delegated agencies/tribes are reviewing the certifications consistent with the CMS. Regions also should ensure that Title V permits do not shield sources subject to a pending or current CAA enforcement action or investigation, and that draft Title V permits include appropriate placeholder language for the applicable requirement at any affected units. Regions should ensure that consent decree requirements, including required schedules of compliance are incorporated into underlying federally enforceable non-Title V and Title V permits.
- Include evaluations of the proper use and disposal of ozone-depleting chlorofluorocarbons (CFCs), hydrochlofluorocarbons (HCFCs), halon fire suppressants and other ozone depleting substances (ODS) as part of routine full compliance evaluations (FCEs)/partial compliance evaluations (PCEs) to the extent the regulations apply.
- Inspect federal facilities, initiate enforcement actions to address non-compliance at federal facilities, and seek penalties, where appropriate, consistent with the 1997 penalty policy for CAA violations by federal agencies.
- Perform CAA section 112(r) inspections at regulated facilities in the Region, including high risk facilities. A high risk facility is one which meets one or more of the following criteria: 1) any facility which has reported worst-case scenario population that exceeds 100,000 people based on the Risk Management Program (RMP); 2) any RMP facility with a hazard index greater than or equal to 25; and/or; 3) any facility that has had one or more significant accidental releases within the previous five years. (Note: facilities that have only program one process are not considered high risk). Inspections at high-risk facilities should also include an evaluation of compliance with applicable EPCRA and CERCLA requirements.
- Evaluate facilities that experience significant chemical accidents to determine compliance with CAA sections 112(r)(1) and (7) and pursue an appropriate enforcement response for any violations.
- Conduct CAA section 112(r) inspections in accordance with the recently issued "Guidance for Conducting Risk Management Program Inspections under Clean Air Act Section 112(r)" which updated and superseded the "Guidance for Auditing Risk Management Plans/Programs under Clean Air Act Section 112(r) of August 1999. This document establishes final EPA policy on involvement of facility employees and employee representatives in EPA and delegated agency on-site compliance inspections as provided for in CAA section 112(r)(6)(L).
- Focus on identifying RMP non-filers and initiating enforcement in accordance with the June 30, 2010 memorandum titled 'Identification of Facilities Subject to 40 CFR Part 68'.
- Work to bring 100% closure to any self-disclosure received by the Region.

- Settle or litigate cases filed in years prior to FY2012.
- Exercise authority in accordance with the 2008 Civil Monetary Penalty Inflation Adjustment Rule and the Amendments to the CAA Civil Penalty Policy.
- Ensure compliance with environmental statutes in Indian country unless and until a Tribe obtains primacy.

COMMITMENT CAA04: The number of compliance evaluations to be conducted by the regions at majors sources, 80% synthetic minors, and other sources (as appropriate). [Note: Region should break out evaluation projections by source classification and by compliance monitoring category (FCE, PCE, and Investigations). In the comment section, each region should also provide the number of federal facility FCEs, PCEs and investigations. Projected investigations under this commitment are those investigations initiated by the Regions for the air enforcement program outside of the National Enforcement Initiatives, and identified by the air program (e.g., MACT, NSPS).

4. Reset Our Relationships with States

The Regions should work with the state/local agencies and Tribes to identify priorities and align resources to implement the above commitments. This includes:

- Holding annual planning meetings with senior federal and state management to discuss air quality standards, permitting, and enforcement when developing program goals and annual monitoring and enforcement work plans. Convening routine and regular (several times per year) meetings with senior state management to assess progress in how the State has been performing overall in its implementation of the program. These meetings may be held in person or through conference calls or other venues, as appropriate. Regular frequency of these meetings is strongly suggested as a best practice for ensuring progress in meeting goals.
- Where a state is not meeting performance expectations, the Regions should take enforcement actions to address serious violations, particularly in the absence of an appropriate response by the state. The Regions should focus oversight resources to the most pressing performance problems in states and should work to demonstrably improve state performance through these actions. The Regions need to take action when necessary to communicate which issues need attention to achieve the goals of the federal environmental laws and ensure a level playing field between States. Ensuring delegated agencies implement compliance monitoring and enforcement programs in accordance with national guidance/policy (e.g., the CAA CMS; HPV Policy; CAA National Stack Testing Guidance; Area Source Implementation Guidance). The Regions should monitor the level and quality of efforts undertaken by the delegated agencies to ensure strong enforcement of environmental laws. Enforcement actions, whether taken by the Regions, delegated states/locals, or Tribes should be timely, appropriate, and accurately reported.
- Negotiating facility-specific CMS plans with all delegated agencies. Throughout the year, the Regions are to be evaluating progress and working with delegated agencies to revise such CMS plans as necessary.
- Having frequent (at least monthly) discussions with delegated agencies to ensure consistent implementation of the HPV Policy.

- Implementing the State Review Framework for the CAA Program and ensuring progress with corrective actions identified in the SRF reports.
- Consulting with Tribes on the central role that enforcement and compliance plays in EPA's direct implementation program and oversight of approved tribal programs.

COMMITMENT CAA06: Ensure that delegated state agencies implement their compliance and enforcement programs in accordance with the CAA CMS and have negotiated facility-specific CMS plans in place. The Regions are to provide the number of FCEs at majors and 80% synthetic minors to be conducted by individual state/local agencies to demonstrate program implementation consistent with CMS. However, if a delegated agency negotiates with a Region an alternative CMS plan, this Commitment should reflect the alternative plan. [Note: Break out evaluation projections (e.g., FCEs; PCEs included in alternative plan) by source classification]. Prior to approving an alternative plan, Regions should consult with the Office of Compliance (OC) and provide OC with information on how the state/local agency compliance monitoring air resources will be redirected and the rationale for making the change.

5. Improve Transparency

The Regions should:

- Work with the state/local agencies and Tribes to verify that their compliance and enforcement data is added to the Air Facility System (AFS), the national repository for air stationary source compliance monitoring and enforcement data.
- Enter complete, accurate, and timely data consistent with the AFS Information Collection Request (ICR) and Agency policies. Agreements with delegated agencies to provide complete, accurate, and timely data should be incorporated in documents such as memorandum of understanding (MOU), State Enforcement Agreements (SEAs), Performance Partnership Agreements (PPAs)/ Performance Partnership Grants (PPGs) or Section 105 grant agreements.
- Work with EPA Headquarters to modernize AFS.

COMMITMENT CAA07: The Regions and delegated agencies should enter 100% of MDRs in AFS consistent with Agency policies, including the 2010 FRV Clarification, and the AFS ICR. The reporting of such complete, accurate, and timely data by delegated agencies should be reflected in written, up-to-date agreements with the Regions. If the Region is responsible for entering data for a delegated agency or Tribe, the Region should identify the delegated agency or Tribe.

6. Relevant Policies and Guidances

Additional information about OECA's CAA programs can be found at:

http://www.epa.gov/compliance/monitoring/programs/caa/index.html
http://www.epa.gov/compliance/civil/caa/index.html

List of relevant CAA policies and guidance:

- The Air Facility System Business Rules Compendium www.epa.gov/compliance/resources/policies/data/systems/air/afsbusinessrulescompendium.pdf
- The Air Facility System Minimum Data Requirements www.epa.gov/compliance/resources/publications/data/systems/air/mdrshort.pdf
- CAA Stationary Source Compliance Monitoring Strategy www.epa.gov/compliance/resources/policies/monitoring/cmspolicy.pdf
- CAA National Stack Testing Guidance www.epa.gov/compliance/resources/policies/monitoring/caa/stacktesting.pdf
- Area Source Rule Implementation Guidance http://www.epa.gov/compliance/resources/policies/monitoring/caa/areasource.pdf
- The Timely and Appropriate Enforcement Response to High Priority Violations www.epa.gov/compliance/resources/policies/civil/caa/stationary/issue-ta-rpt.pdf
- The Timely and Appropriate Enforcement Response to High Priority Violations Workbook www.epa.gov/compliance/resources/policies/civil/caa/stationary/hpvmanualrevised.pdf
- CAA Stationary Source Civil Penalty Policy www.epa.gov/compliance/resources/policies/civil/caa/stationary/penpol.pdf
- CAA Section 112(r) Combined Enforcement Policy http://epa.gov/compliance/resources/policies/civil/caa/stationary/caa112r-enfpol.pdf
- Guidance for Conducting Risk Management Program Inspections under Clean Air Act Section 112(r) www.epa.gov/oem/docs/chem/audit_gd.pdf
- Civil Penalty Policies http://cfpub.epa.gov/compliance/resources/policies/civil/penalty/

SECTION IV: KEY PROGRAM PRIORITIES AND STRATEGIES TO ADDRESS ENVIRONMENTAL PROBLEMS FROM WATER POLLUTION

A. Clean Water Act (CWA)

OECA addresses water pollution problems resulting from noncompliance with our nation's environmental statutes and regulations, including the following CWA programs:

- National Pollutant Discharge Elimination System (NPDES) Program (including general and individual permits from sources such as municipal and industrial wastewater treatment facilities and their collection systems, concentrated animal feeding operations (CAFOs), industrial storm water, and vessels).
- Pretreatment Program
- Biosolids/ Sludge Program
- CWA Section 404 (Wetlands) Program
- CWA Section 311 (Oil Pollution Act, including the Spill Prevention Control and Countermeasures (SPCC) Program)

1. Clean Water Act Action Plan

OECA together with EPA Regions, States and the Office of Water continue to implement the CWA Action Plan ("the Action Plan") issued in October 2009. Pursuant to the Action Decision Document, scheduled for issuance in the 3rd quarter of FY11, EPA is making four fundamental changes to revamp the NPDES permitting, compliance and enforcement program to better address today's serious water quality problems:

1. Replace existing paper reporting with electronic reporting, automated compliance evaluations and improved transparency.
2. Create a new paradigm for regulations and permits to compel compliance via public accountability, self-monitoring, electronic reporting and other methods.
3. Address this decade's serious water pollution problems by re-tooling key NPDES permitting and enforcement practices, and continue to vigorously enforce the Clean Water Act.
4. Conduct comprehensive and coordinated permitting, compliance, and enforcement programs to improve state and EPA performance in improving water quality.

These elements are consistent with the Assistant Administrator's goals for the compliance and enforcement program, listed on pages 6 and 7 of this Guidance.

States and regions should participate in workgroups tasked with designing these changes as well as use/implement the new tools, pilot projects, policies and regulations as appropriate. A list of the workgroups and pilot projects along with the lead OECA contacts for these efforts will be available in the third quarter of FY11 on the CWA Action Plan OTIS site. Regions should notify OECA leads of their interest in working on these projects. **For FY12, Regions should participate in the following CWA Plan efforts already under development:**

- Where appropriate, and in accordance with any subsequent guidance, enforcement actions should require electronic reporting, as appropriate, for all data required by the enforcement actions.
- Where appropriate, and in accordance with any subsequent guidance, compliance assistance, monitoring and enforcement personnel should provide relevant feedback to permitting offices regarding permit prioritization and modifications to consider when permit is renewed.
- Where the regions have direct implementation responsibilities, utilize multi-sector general permit (MSGP) violation and benchmark data to support monitoring and enforcement. The Water Enforcement Division is working with the Office of Water to obtain these data and make them available to regions in a usable format. The data will also be used to inform decisions on development of model documents such as 308 information requests, administrative orders, and administrative penalty orders.
- Regions should investigate the Clean Water Act (CWA) compliance status of surface mining facilities within each Region, including mountaintop removal mining operations. Regions should evaluate the compliance status of such facilities with respect to both NPDES permitting requirements as well as 404 permitting requirements. If CWA violations are identified, enforcement action should be taken where appropriate.
- Actively participate in CWA Action Plan pilots (as developed in FY2011 for implementation in FY2012) to address effluent violations reported on DMRs using new strategies and tools, such as expedited administrative enforcement actions and electronic compliance assistance. Consider pilots or innovate approaches to deal with more routine, paperwork violations.
- Actively market and implement the use of NetDMR or other e-DMR tools by permittees for the electronic transfer of Discharge Monitoring Reports (DMR) to ICIS-NPDES, supported by use of the National Environmental Information Exchange Network (Exchange Network), by all of their NPDES permitted facilities.
- Regions should support additional CWA Action Plan commitments as further developed.
- Regions should broaden the scope of targeting, monitoring and enforcement beyond traditional NPDES majors, utilizing new targeting tools as developed. To assist in these efforts, OECA and OW recently released a DMR Pollutant Loadings Tool (currently in Beta version for user testing) to help the Regions determine who is discharging and where, along with what pollutants are being discharged and how much. This tool includes minor facilities, and can be found at www.epa-otis.gov/echo/dmr_loading_tool.html.

2. High Priority Performance Goal

For FY 2012, pursuant to direction from the Office of Management and Budget, each federal department and agency must develop and report on a set of High Priority Performance Goals (HPPGs) that will measure performance for a limited set of high priority activities. EPA has developed a HPPG that measures EPA's actions to improve water quality through implementation of the Clean Water Act Action Plan. For FY 2012, OECA has the following HPPG:

- Increase pollutant-reducing enforcement actions in waters that don't meet water quality standards, from an FY2009 baseline of 32% to a target of 37% in FY2012.

This HPPG aligns with the Clean Water Act Action Plan goal of targeting enforcement to serious water pollution problems. The HPPG is not based on expected increases in enforcement actions, but rather a greater emphasis on taking enforcement actions against facilities that discharge pollutants into waters not achieving water quality standards for those standards. The enforcement actions are concluded judicial and administrative enforcement cases that result in a reduction in the relevant pollutants. The HPPG is limited to EPA actions only because at present OECA does not have the necessary information to report on state enforcement actions. For purposes of the HPPG, we define waters as not meeting water quality standards as broader than the impaired waters list. See the November 11, 2010 "Guidance on Implementing FY2011 High Priority Performance Goals" for more details on how to target and report for this measure.

OECA will continue to improve GIS-based targeting tools to link relevant water quality information to facility location, discharges and compliance information as part of developing the next generation of analytical tools under the Action Plan.

Continuing in FY 2012, OECA will be tracking the performance of Regions to target enforcement actions on facilities discharging into waters not achieving water quality standards.

COMMITMENT CWA 10: Regions should focus their CWA enforcement work towards meeting the national target of 37% for concluding federal judicial and administrative enforcement actions resulting in a reduction of pollutants that pertain to facilities discharging into waters that do not achieve water quality standards. The Regions should report their data per the November 2010 guidance issued by OECA, and any subsequent updates issued for FY2012.

3. Implement National Enforcement Initiatives

The relevant FY 2011 – 2013 national enforcement initiatives for CWA programs are:

Keeping Raw Sewage and Contaminated Stormwater Out of Our Nation's Waters: EPA will continue its enforcement focus on reducing discharges of raw sewage and contaminated stormwater into our nation's rivers, streams and lakes. Older urban areas in particular have aging sewer systems that are not designed to handle heavy rainfall and snowfall, in addition to growing urban populations and industrial discharges. As a result, untreated sewage too frequently overflows from sewers into waterways, or backs up into city streets or basements of homes. Raw sewage contains pathogens that threaten public health, leading to beach closures and public advisories against fishing and swimming. This problem particularly affects older urban areas, where minority and low income communities are often concentrated. In addition, stormwater runoff from urban streets and construction sites carries sediment, metal, oil and grease, acid, chemicals, toxic materials and industrial waste into surface waters. Many cities use rivers as the source of their drinking water, and contaminants in the water increase the difficulty and expense of treating the water for drinking water use. The Clean Water Act requires municipalities to treat sewage before it is discharged and to control contaminated stormwater discharges, but many municipalities are not complying with these requirements. EPA's enforcement efforts in recent years have resulted in agreements by many cities to remedy these problems, but the problem remains in many other cities. This National Enforcement Initiative will focus on reducing discharges from combined sewer overflows (CSOs), sanitary sewer overflows (SSOs), and

municipal separate storm sewer systems (MS4s) in FY2011-13, by obtaining cities' commitments to implement timely, affordable solutions to these problems, including increased use of green infrastructure and other innovative approaches. EPA is committed to working with communities to incorporate green infrastructure, such as green roofs, rain gardens, and permeable pavement, into permitting and enforcement actions to reduce storm water pollution and sewer overflows. Regions should consider and promote the opportunity to utilize green infrastructure controls in municipal enforcement actions. Green infrastructure approaches have the potential to help reduce and/or eliminate CSOs and SSOs in a cost effective manner while providing a variety of environmental and community benefits, including improved water and air quality, increased energy efficiency, green spaces and economic development. For these reasons, EPA is committed to the incorporation of green infrastructure projects into municipal settlements where appropriate. Information on green infrastructure projects can be found at: http://cfpub.epa.gov/npdes/home.cfm?program_id=298.

Preventing Animal Waste from Contaminating Surface and Ground Waters: Concentrated Animal Feeding Operations (CAFOs) are defined as agricultural operations where animals live in a confined environment (see 40 CFR Section 123). CAFOs can contain large numbers of animals, feed, manure, dead animals and production operations on a small land area. The animals generate a large amount of manure, which typically is held in lagoons or spread on nearby fields. If not properly controlled, manure can overflow from lagoons or run off from the fields into nearby surface waters or seep into ground water, carrying disease-causing pathogens, nutrients, or other contaminants into the water. This contaminates both surface waters and ground waters that may be used as drinking water sources and harms fish and other aquatic species in surface waters.

Several studies have found high concentrations of CAFOs in areas with low income and minority populations. This is typical in many rural areas of the country where livestock facilities are located. Children in these areas may be particularly susceptible to potential adverse health effects through exposure to contaminated surface waters or drinking water from contaminated ground water sources. The Clean Water Act prohibits the discharge of these pollutants into surface waters, and EPA's regulations require larger CAFOs to have permits (which impose control requirements) if the waste produced by animals on the farm will run off into surface waters. However, many CAFOs are not complying with these requirements, so EPA will continue to strengthen its enforcement focus on these facilities, and those in priority watersheds. For FY2011-13, OECA will focus primarily on existing large and medium CAFOs identified as discharging without a permit. In addition, each Region will consider a variety of factors to prioritize CAFO – related activities (i.e., compliance assistance, monitoring and enforcement). These factors include identifying watersheds where CAFOs are negatively affecting water quality, proximity to vulnerable communities, strengths and challenges of state CAFO programs, as well as other considerations.

Assuring Energy Extraction Sector Compliance with Environmental Laws: As the nation expands its search for new forms and sources of energy, there is an urgent need to assure that we develop "clean energy" sources that protect our air, water and land. Some energy extraction activities, such as new techniques for gas extraction, pose a risk of pollution of air, surface waters and ground waters if not properly controlled. For example, an unprecedented acceleration

of natural gas leasing and development has led to a significant rise in the level of air pollution throughout the intermountain West. Drilling and fracking activities have led to concerns about ground water pollution and the safety of drinking water supplies in various parts of the country. To address these emerging problems, OECA's energy extraction initiative will focus on efforts to assure that natural gas extraction activities are complying with federal requirements to prevent pollution of our air, water and land. This initiative will be undertaken in particular areas of the country where natural gas extraction activities are concentrated, and the focus and nature of our enforcement activities will vary with the type of activity and pollution problem presented.
Implementation plans are being developed for the Municipal, CAFO, and Energy Extraction Initiatives that will include final goals and measures, and guidance on implementation. Region–specific commitments for activities to support the goals and measures will be negotiated through the ACS process.

4. Link with Top Office of Water Priorities

OECA addresses top Office of Water priorities for the CWA in the following ways:

- Restoring and Protecting Urban Waters: As part of aggressively going after pollution that matters to communities, OECA's enforcement and compliance will be particularly focused on protecting communities by getting raw sewage out of the water, cutting pollution from animal waste, and reducing polluted stormwater runoff.

- Strengthening Protections for Our Waters: OECA is improving protection of water through the Clean Water Act Action Plan http://www.epa.gov/compliance/civil/cwa/cwaenfplan.html).

- Chesapeake Bay: Regions 2, 3, 4, and 5 should refer to the Chesapeake Bay Compliance and Enforcement Strategy implementation plans (available upon request) for details about expectations and commitments for storm water, waste water, air and CAFOs. Implementation plans include goals and measures with targets for accomplishing activities to support each, e.g., 3 MS4 audits per year. (Note: CAFO commitments are not yet finalized.) The Strategy and other relevant information related to compliance and enforcement is posted at http://www.epa.gov/compliance/civil/initiatives/chesapeakebay.html)

5. Aggressively Go After Pollution Problems That Make a Difference in Communities

Communities across the country depend on clean water as a source of drinking water, a habitat to support healthy ecosystems and as a resource for recreation and fishing. They expect protection from exposure to water contaminated by raw sewage, animal waste and pollutants in urban storm water run-off.

Direct exposure to raw sewage and associated high levels of disease-causing organisms can be a particular problem for communities located in older urban areas where the aging municipal wastewater infrastructure may be failing or unable to handle the demands of a growing urban population. When pipes break, equipment fails or the system exceeds capacity, untreated wastewater flows into waterways, homes and city streets, most significantly exposing the community to pathogens. Urban water bodies can also be assaulted by large volumes of uncontrolled polluted storm water from streets, parking lots, and commercial and industrial businesses. Many of these older urban areas include minority and low income communities.

Exposure to animal waste from concentrated animal feeding operations may particularly affect low income and minority populations in rural areas. Water bodies polluted by the waste can cause human illness after swimming or wading and result in contaminated fish and shellfish. This is a particular problem with respect to subsistence fishing, which is most frequent in minority and low income populations.

OECA, together with the Office of Water and state water control agencies will work to identify at-risk waters and use their appropriate regulatory tools, including setting strong water quality standards, issuing protective and enforceable NPDES permits and addressing serious violations through effective enforcement to ensure water quality protection and restoration.

A. CWA NPDES Program

Regions in non-authorized States and Indian country, and authorized States and Tribes, should:

- Target to identify serious sources of pollution and serious violations. Use the new tools developed pursuant to the CWA Plan in FY2011 such as available ambient monitoring data, pollutant loadings, and GIS, to target the most significant sources of pollutants on those water bodies and watersheds including those that are not meeting water quality standards as broadly defined in the HPPG Guidance.
- OECA has developed the *Inspection Targeting Model* for the Clean Water Act (currently in Beta version for user testing) that includes "Is the facility or outfall within 15 Miles Upstream of a Drinking Water Intake?" as part of its indexing. This model can be accessed through OTIS (www.epa-otis.gov/otis/itm) and OECA is looking for feedback on this model. Develop annual compliance monitoring plans that take advantage of the flexibility available in the National Pollutant Discharge Elimination System Compliance Monitoring Strategy for the Core Program and Wet Weather Sources (issued October 17, 2007), along with additional approaches identified in the CWA Action Plan, to target inspections aimed at identifying and addressing serious water quality problems where NPDES compliance and enforcement tools will be effective in addressing the pollution problem.
- Evaluate all violations to determine seriousness and determine an appropriate response. Facilities in significant noncompliance (SNC) should be acted on, along with sources with serious effluent limit violations, unpermitted discharges, systemic reporting problems or violations at facilities with potential to seriously impact to water quality.

Initiate and complete civil enforcement actions, where appropriate to address serious violations contributing to a community's water quality problems. This includes judicial and administrative actions. Ensure compliance with consent decrees and administrative orders. Implement targeted "real time" (quick response) enforcement activities to address violations impacting communities' waters, such as violations at concentrated animal feeding operations. OECA will provide additional training and guidance on this approach in FY11. Utilize assistance, incentives, monitoring and enforcement tools to address serious noncompliance problems causing water quality problems in targeted communities and watersheds.

In addition, Regions should:

- Implement CWA specific geographic compliance and enforcement strategies, as appropriate for their Region, including CWA Action Plan pilots, the Chesapeake Bay Compliance and Enforcement Strategy, and other region-specific geographic initiatives.
- Routinely review all DMRs and non-compliance reports received for compliance with permit requirements where the Region directly implements the program. (Note that Regions may accomplish this review through a routine screen of the PCS or ICIS-NPDES data and reviewing the DMRs themselves as necessary.)
- Where the Region has direct implementation responsibilities, they should inspect and audit pretreatment POTWs and Industrial Users (IUs) to evaluate the effectiveness of the regulatory authorities pretreatment program, either in conjunction with other compliance inspections at major and minor POTWs such as compliance evaluations (CEIs) or separately.
- Where the Region has direct implementation responsibilities, they should inspect biosolids/sludge facilities to evaluate the permittee's compliance with sludge monitoring, record keeping and reporting, treatment operations, and sampling and laboratory quality assurance, either in conjunction with other compliance inspections at major and minor POTWs such as compliance evaluations (CEIs) or separately.
- Use all available data to benchmark and monitor state performance using data from federal and state data systems, permitting and enforcement performance reviews, and other audit or evaluation reports. These include State Review Framework reviews, Office of Water Permit Quality Reviews, regular EPA/State meetings to review performance, state data not entered into national databases and GAO and/or IG reviews of state performance. In FY2011, EPA developed an integrated and streamlined NPDES enforcement and permitting oversight review process, issued guidance and provided training to EPA Regions. In FY12, EPA Regions will pilot integrated NPDES enforcement and permitting oversight reviews.
- Where States have exhibited a widespread and long-standing problem with significant aspects of their permitting or enforcement programs, Regions should object to permits or take direct enforcement actions in those states in accordance with EPA's June 22, 2010 Memorandum titled, "Interim Guidance to Strengthen Performance in the NPDES Program" signed by Cynthia Giles, Assistant Administrator for OECA and Peter Silva, Assistant Administrator for Water. Regions should focus oversight resources on the

most pressing performance problems in States which had been identified through permitting and enforcement reviews. Regions and States must work together to demonstrably improve state performance. Guidance will be made available under the Clean Water Act Action Plan to further clarify expectations.

- Coordinate, as appropriate, with the Coast Guard and other federal agencies which have significant roles in addressing spills, and follow all related Memoranda of Agreement including the MOU for the Vessels General Permit.
- Continue implementing the Federal Facility Integrated Strategy on Stormwater.
- Encourage States that are currently using the NPDES Permit Compliance System (PCS) to prepare to migrate to the modernized data system, ICIS-NPDES. The batch data flow capability from States to ICIS-NPDES through EPA's National Environmental Information Exchange Network is currently under development and is scheduled to be implemented in three distinct releases. The first release, completed February 2011, will provide functionality for the transmittal of Permit and Facility information. The second release, scheduled for January 2012, will provide functionality for the transmittal of Inspection information. The final release, scheduled for March of 2013, will provide functionality for the transmittal of remaining NPDES data families to include enforcement actions, single event violations, and program reports. Regions should support their States as they move to ICIS-NPDES.
- Regions should seek injunctive relief to correct violations and protect watersheds, including implementing green infrastructure and innovative technologies, where appropriate.

COMMITMENT CWA07: By December 31, 2011, provide a specific NPDES Compliance Monitoring Strategy (CMS) plan for each State in the Region. The plan should provide universe information for the CMS categories; sub-categories covered by the CMS and combined EPA and State expected accomplishments for each category and subcategory. The plan should identify trade-offs made among the categories utilizing the flexibility designed into the CMS policy to target the most significant sources with potential to impact water quality. At end of year provide for each State a numerical report on EPA and state inspection plan outputs, by category and subcategory. To increase the transparency of NPDES inspection data, OECA will work with Regions and State associations to develop formats for releasing inspection data on CMS implementation performance on a state-by-state basis.

B. CWA Section 404 – Discharge of Dredge and Fill material

Regions should:

- Coordinate, as appropriate, with other federal agencies (e.g., U.S. Army Corps of Engineers, Natural Resources Conservation Service (NRCS), Fish and Wildlife Service, etc.) which have significant roles in wetlands protection through the use of memoranda of understanding and memoranda of agreement or other appropriate mechanisms.
- Meet with Corps Districts on an annual basis to establish regional priorities and communicate priorities to OECA;
- Review field level agreements with Corps Districts, and revise to make them consistent with Section 404 Enforcement Strategy, as appropriate;

- Regions should utilize the Office of Water's DARTER (Data on Aquatic Resources Tracking for Effective Regulation) system as well ICIS (Integrated Compliance Information System) in their targeting efforts to identify potential repeat and flagrant violators (ICIS continues to be the data base of record for tracking EPA information on 404 enforcement actions);
- Develop methods to effectively leverage other program resources to more systematically identify potential serious Section 404 violations and take appropriate enforcement response to address these violations. Share effective techniques with OECA for use in developing the national wetlands enforcement strategy;
- Utilize existing Regional cross training opportunities as well as opportunities identified by HQ to cross-train inspectors and to train other federal and state agencies and stakeholders to identify CWA 404 violations;
- The Section 404 Enforcement Strategy will be piloted during 2011 - 2012, and the Regions are expected to work with OECA in implementing the strategy.

C. CWA Section 311 – Oil Pollution Act

The activities described below are intended to be conducted by enforcement staff or contractors. OECA has contract resources available to support such work

Regions should:

- Participate in multi-regional judicial enforcement cases to address spills from inter-state pipelines and others, such as production facilities, on a company-wide basis. Cases will include company-wide injunctive relief requirements to prevent future spill violations at all facilities of the owner or operator.
- Participate in multi-regional judicial enforcement cases to address federal response planning (FRP) violations at facilities owned or operated by the same company. Cases will include company-wide injunctive relief requirements to improve facility response planning and implementation at all facilities of the owner or operator.
- Investigate and develop informal, administrative and judicial enforcement actions to address noncompliance with EPA product schedule requirements for use of dispersants and other substances. Investigate, target and develop informal, administrative and judicial enforcement actions to address spill prevention, and facility response planning violations at facilities subject to EPA regulations, including offshore platforms within EPA jurisdiction. Also investigate, target, and develop informal, administrative and judicial enforcement actions to address discharge violations (spills) where ever the violation occurs, whether or not the spill occurred at a facility subject to EPA's spill prevention or facility response planning regulations.
- Whenever needed in the context of an enforcement action or enforcement targeting effort, conduct inspections and enforcement investigations as needed to confirm violations or develop enforcement cases. These activities are intended to be conducted by enforcement staff or contractors, when needed for enforcement targeting or case development.
- Conduct enforcement investigations to identify noncompliance, target appropriately for enforcement response, and build cases for enforcement actions. Enforcement

investigations could include use of CWA Section 308 and/or 311(m) information requests, independent audits, interviews, review of inspection reports, coordination with state and other federal agencies, use of public tips and complaints, review of public databases, or other investigative means. Whenever spill or regulatory enforcement is pursued at facilities subject to EPA regulations, the case development staff should evaluate whether the facility is in compliance with allspill prevention and facility response planning requirements and should include claims in the enforcement case to address all noncompliance in these areas.

- As part of enforcement targeting work, review spill notification reports to the National Response Center, pipeline spill reports to the Pipeline and Hazardous Materials Safety Administration, spills reported to states and other available sources to identify spill violations. Issue CWA 308 information requests to confirm violations and identify causes of the spills. Take appropriate enforcement action to address spills of oil and hazardous substances that have occurred, to include penalties and injunctive relief to prevent future violations from similar causes across all facilities of the same owner or operator.
- Participate in OECA-led coordination and strategy meetings, as appropriate.

6. Reset Our Relationships with States

Every Region and State, working together, should conduct a CWA annual planning process that brings the different components of the regional and state NPDES program (water quality standards and assessment, permitting and enforcement) all to the table together, identifies and discusses national, regional, and state priorities versus available resources at both the state and federal levels, and results in collaborative annual work plans that use all available mechanisms to get work done, such as federal and state work-sharing, innovative approaches to monitoring facilities or addressing violations, etc.

Regions should:

- Hold annual planning meetings with each State to develop collaborative annual work plans. Submit summary report to headquarters by October 31, 2011.
- Convene routine and regular meetings between the Region and State to discuss progress towards meeting annual permitting and enforcement commitments, and how the State has been performing overall in the NPDES program.
- Where States are not meeting performance expectations, Regions should take enforcement actions to address serious violations. Regions should focus oversight resources to the most pressing performance problems in States and should work to demonstrably improve state performance through these actions. Regions need to take action when necessary to communicate what things need attention to achieve goals of the federal environmental laws and ensure a level playing field between States.
- Conduct a sufficient number of oversight NPDES inspections to ensure the integrity and quality of each State or Tribe with primacy compliance monitoring programs. The Regions have flexibility to determine the appropriate number of oversight inspections needed to ensure proper state inspection conduct and documentation. Oversight inspections are not "joint" inspections. Oversight inspections can be conducted by

accompanying state inspectors during inspections, or conducting a separate inspection at the same facility at a later date to verify the same findings.

- Implement the State Review Framework (SRF) for the NPDES program in conjunction with permit quality reviews and assure implementation associated with corrective actions identified in the SRF reports.
- Consider the following information when conducting state program oversight:
    - number of SNCs identified (and percent of universe), especially those related to effluent exceedance or illegal discharges by state and by region
    - number (and percent) addressed in a timely and appropriate manner
    - results of SRF and permit quality reviews and progress in correcting identified issues.
- Consult with Tribes on the central role that enforcement and compliance plays in EPA's direct implementation program and oversight of approved tribal programs.

COMMITMENT CWA09: Regions should submit summaries of the collaborative EPA/State annual work planning process addressing NPDES permitting, compliance monitoring, and enforcement activities, including work-sharing, to the Office of Compliance and the Office of Wastewater Management by October 31, 2011 for FY 2012 activities.

7. Improve Transparency

- Data regarding state assessments, priorities and performance under the CWA should be made public by the Regions and Headquarters, where possible, on a regular basis in a manner easily understood and used by the public.
- If data systems are not able to support reporting at end-of-year FY 2011, the Regions should manually report using instructions specified in the multi-program fiscal year reporting guidance memorandum.
- Regions should work with the States and Tribes to verify that their compliance and enforcement data is input into national databases.
- Compliance monitoring activities conducted pursuant to the goals in CMS and the state-specific plans should be reported into the appropriate national information system, either PCS or ICIS-NPDES, in accordance with documents which establish data requirements and reporting timeframes for those systems. States must ensure that all required compliance and enforcement data is input or transmitted to the national databases. EPA encourages States to expand their use of the national databases to include compliance and enforcement data that pertains to the entire NPDES universe
- Regions should review reporting practices to ensure that oil and hazardous substance spills are timely and accurately reported to the National Response Center (NRC)
- Regions should make information available to communities, including Native American and Alaskan Natives, who lack access to the internet.

8. Relevant Policies and Guidances

Additional information about OECA's Clean Water Act programs can be found at:
http://www.epa.gov/compliance/monitoring/programs/cwa/index.html
http://www.epa.gov/compliance/civil/cwa/index.html

B. Safe Drinking Water Act (SDWA)

OECA addresses drinking water pollution problems through the following SDWA programs:

- Public Water System Supervision (PWSS) Program
- Underground Injection Control (UIC) Program

EPA's focus on regulated drinking water systems, including those in Indian country, protects the public from the potential acute and chronic health effects of drinking water that fails to comply with the SDWA. The Enforcement Targeting Tool (ETT) identifies those public water systems (PWSs) that have the most serious, most numerous, and longest-lasting unresolved drinking water violations. The Enforcement Response Policy (ERP) establishes EPA's expectations of how primacy agencies are to address drinking water violations and return violating PWSs to compliance.

The ETT assigns to each drinking water violation a numerical point value weighted for its severity, and applies a formula that generates a total score for each PWS with unresolved violations. Because violations of health-based standards and major violations of monitoring and reporting requirements for acute contaminants present the most serious risks to the public's health, violations of these types are assigned the highest point values. Major monitoring and reporting violations related to chronic contaminants, minor monitoring and reporting violations, and public notification violations are assigned lower point values. The higher a PWS's total ETT score, the more serious is its overall noncompliance.

The ERP provides that all drinking water violations at PWSs are to be resolved and that PWSs are returned to compliance. Additionally, the ERP directs that if a PWS reaches an ETT score of 11 or higher before its violations are resolved, that PWS will be considered a priority system that must either return to compliance or receive formal enforcement action within six months of having reached a score of 11. It is OECA's expectation that primacy agencies will simultaneously be working to reduce their backlog of systems that have already been at a score of 11 or higher for more than 6 months. As a longer term goal, primacy agencies are encouraged to address violations at noncomplying PWSs before they become priority systems. A quick response to SDWA violations decreases the risks to public health and allows primacy agencies more flexibility as they work with PWSs to achieve sustained compliance. By focusing resources on PWSs in this way, the ERP helps ensure those PWSs return to compliance in a timely manner.

1. Link with Top Office of Water Priorities

OECA addresses top Office of Water priorities for the SDWA in the following ways:

- <u>Safeguarding Public Health</u>: As part of aggressively going after pollution that matters to communities, OECA will use all enforcement and compliance tools to assure public water systems deliver safe drinking water, with continued focus on drinking water in schools and in Indian country.

2. Aggressively Go After Pollution Problems That Make a Difference in Communities

The ETT and ERP apply equally to EPA direct implementation, including in Indian country, and implementation by states, territories, and tribes with primacy. EPA's goal is to ensure that the drinking water delivered in Indian country is as safe as the drinking water delivered to the rest of the American public.

The ETT's scoring formula focuses enforcement resources on those systems with health-based violations, those with major monitoring and reporting violations, and those that show a history of violations across multiple rules. Its system-based methodology is intended to ensure national consistency and the integrity of the Public Water System Supervision national enforcement program while providing increased protection for the public.

Regions, states, territories, and tribes with primacy will work to resolve all SDWA violations. Because ETT scores identify the PWSs with serious noncompliance problems, primacy agencies can establish priorities allowing them to address systems with the worst violations first. The timely and appropriate response guidelines in the ERP ensure timely action is taken to return serious violators to compliance.

In accordance with the ERP, all PWSs that reach a score of 11 or higher (priority systems) are to be addressed with a formal enforcement action or returned to compliance within six months of the quarterly ETT report on which the system first is reported as having a score of 11 or higher. OECA headquarters will track primacy agency performance in meeting the timely and appropriate provisions of the ERP.

COMMITMENT SDWA02:

During FY 2012, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2011 ETT report[3].

State, territory and tribal breakouts should be indicated in the comment field of the Annual Commitment System.

3. Reset Our Relationships with States

Regions are responsible for working with states, territories, and tribes with primacy in an oversight capacity to ensure that the ETT and ERP are implemented as intended. While OECA and the Regions will discuss progress returning systems to compliance, identify those priority systems for which return to compliance is impracticable, and oversee performance overall in implementation of the program, the Regions will hold more in depth discussions with their states,

[3] A primacy agency's success at addressing violations will be tracked by means of the quarterly ETT reports. Numerical targets may be adjusted at mid-year. While it remains the ERP's goal that all of a priority system's violations will be returned to compliance, a primacy agency has met its commitment under the 2012 SDWA ACS with respect to a priority system if the score for that system has been brought below, and remains below, eleven.

territories, and tribes that include, but are not limited, to progress in returning systems to compliance, monitoring compliance progress on orders, systems addressed, and overall performance in implementing the program. These meetings may be held in person or through conference calls or other venues, as appropriate. EPA strongly suggests a minimum of quarterly communication as a best practice for ensuring progress in meeting goals.

Where states are not meeting performance expectations established by this commitment, regions should take action to ensure the highest priority systems are addressed. Regions should focus oversight resources on the most pressing performance problems in states/territories and should work to improve performance through these actions.

OECA will perform this oversight function with respect to direct implementation programs. OECA will engage with regions on a regular basis to ensure that regions are directly implementing the program in Indian country, Wyoming, and the District of Columbia effectively and applying the ETT and ERP as intended. EPA's direct implementation programs will consult, as appropriate, with potentially impacted tribal governments when conducting inspections and addressing noncompliance at tribal and non-tribal PWSs in Indian country.

4. Improve Transparency

OECA headquarters will report on progress in returning systems to compliance in its annual national compliance report posted on the EPA website at http://cfpub.epa.gov/compliance/resources/reports/accomplishment/sdwa/

Compliance and enforcement data for all drinking water systems will be made available to the public through the Enforcement and Compliance History Online website.

5. Relevant Policies and Guidances

Additional information about OECA's SDWA and tribal programs can be found at:

http://www.epa.gov/compliance/monitoring/programs/sdwa/index.html
http://www.epa.gov/compliance/civil/sdwa/index.html
http://www.epa.gov/compliance/resources/policies/civil/sdwa/drinking_water_erp_2009.pdf

SECTION V: KEY PROGRAM PRIORITIES AND STRATEGIES TO ADDRESS ENVIRONMENTAL PROBLEMS FROM WASTE, TOXICS, AND PESTICIDES POLLUTION

A. Resource Conservation and Recovery Act (RCRA)

OECA's RCRA program addresses the management of solid and hazardous waste and underground storage tanks (UST). For more information on the management of hazardous waste under RCRA Subtitle C, readers are urged to review the RCRA Compliance Monitoring Strategy (CMS) which provides detailed information about goals and measures, policies which allow flexibility from OECA's expectations, program oversight, and other aspects of the RCRA compliance monitoring program.

1. Statutory and Regulatory Requirements

RCRA dictates minimum inspection frequencies for treatment, storage, and disposal facilities (TSDF) - annually for TSDFs operated by state/local governments, and biennially for non-governmental TSDFs. RCRA01 and RCRA01.s apply to TSDFs owned or operated by non-governmental entities, and to TSDFs owned but not operated *by* state/local/tribal governments. RCRA03 applies to TSDFs operated by state/local/tribal governments. The inspections performed under these RCRA commitments should be Compliance Evaluation Inspections (CEIs).

COMMITMENT RCRA01: Project by State, and Indian country where applicable, the number of operating non-governmental TSDFs, to be inspected by the Region during the year[4]. Regions must commit to inspect at least two (2) TSDFs in each State or Indian country unless OECA approves a deviation from this requirement. For example, deviations are given for states with small universes where it might not make sense for a Region to inspect two TSDFs per year. Financial responsibility is an important component of the RCRA core program and should be included as part of the inspection of each TSDF (although the financial responsibility reviews do not have to occur at the same time nor be conducted by the same people who conduct the field inspections).

COMMITMENT RCRA01.s: Project by State the number of operating TSDFs to be inspected by the State during the year.

- The RCRA CMS establishes minimum annual inspection expectations for TSDFs: The inspections for RCRA01 and RCRA01.s should be CEIs. Only one inspection per facility counts towards this coverage measure.

COMMITMENT RCRA03: Inspect each operating TSDF operated by states, local, or Tribal governments.

[4] Currently there is only one TSD in Indian country.

COMMITMENT RCRA04: Project by State and Indian country the number of financial assurance mechanisms to be reviewed by the Region during the year. Regions must commit to review financial test and/or corporate guarantee submissions for compliance with the closure and post-closure regulations at a number of facilities at least equal to the Region's commitment under RCRA01. As an alternative, Regions may choose to conduct formal financial record reviews for facilities that did not have a financial assurance review during the FY 2005-FY 2010 as part of the national enforcement initiative. The financial test/corporate guarantee compliance evaluations or financial record reviews may occur at the same facilities being inspected under RCRA01 or at different TSDFs.

The financial test/corporate guarantee compliance evaluations should take place within 90 days after the facility's annual submission is received.

- Regions should ensure continued review of financial test/corporate guarantee submissions since they present the greatest risk and are the most commonly used instruments.

- Regions are expected to focus on reviewing the universe of TSDFs not formally evaluated during the national priority, and on conducting in-depth reviews of financial test/corporate guarantee submissions.

- Regions are to coordinate with States to conduct these financial assurance reviews.

2. Implement National Enforcement Initiatives

The relevant FY 2011 – 2013 national enforcement initiative for RCRA programs is:

Reducing Pollution from Mineral Processing Operations: Mining and mineral processing facilities generate more toxic and hazardous waste than any other industrial sector, based on EPA's Toxic Release Inventory. Many of these facilities have impacted surrounding communities and continue to pose high risk to human health and the environment. For example, 95 mining and mineral processing sites are on the Superfund National Priorities List and more sites are being added every year, including operating facilities. EPA has spent over $2.4 billion to address the human health and environmental threats to communities, such as exposure to asbestos and lead poisoning in children, as a result of mining and mineral processing. In some cases, EPA had to relocate families because of these threats, especially those to children in low income communities. EPA has inspected 65 mining and mineral processing sites that pose significant risk to communities and found many to be in serious non-compliance with hazardous waste and other environmental laws. Contamination of groundwater and potable water has occurred at many sites, sometimes requiring alternative drinking water supplies or removal of lead-contaminated soil from residential yards. In other cases, toxic spills into waterways from mining and mineral processing caused massive fish kills and impacted the livelihood of low income communities. Some workers at mining and mineral processing facilities have been exposed to spills and mismanagement of toxic and hazardous waste. EPA will continue its

enforcement initiative to bring these facilities into compliance with the law and protect the environment and nearby communities.

OECA has not finalized the goals and annual commitments for its national enforcement initiatives, but it is expected there will be approximately 13 mineral processing inspections required for 2012 nationally.

3. Link with Top OSWER Priorities

OECA addresses top OSWER priorities for RCRA in the following ways:

- Recycling, Waste Minimization and Energy Recovery: OECA maintains an overall enforcement presence in RCRA that supports OSWER in their work.

- Emergency Preparedness, Implementing the EPAct, Response and Homeland Security: OECA maintains an overall enforcement presence in RCRA that supports OSWER in their work.

- Preventing Underground Storage Tank Releases: The RCRA Subtitle I enforcement program is focused on ensuring facilities comply with the UST regulations. These regulations require facilities to monitor UST systems to prevent leaks. OECA's NPM guidance fully supports OSWER's goal of preventing underground storage tank releases through the activities identified in section 4(b).

- Cleaning up Underground Storage Tank Releases: Regions should monitor for compliance with UST regulations. When leaks are found, Regions should assure leaks are addressed as described in the UST Section 4(b) program.

4. Aggressively Go After Pollution Problems That Make a Difference in Communities

a. RCRA Program

Regions and States should inspect pollution problems that matter to communities, and develop enforcement cases that produce significant environmental benefits. Regions, in their oversight and direct implementation roles, and authorized States are expected to follow the guidance in the RCRA CMS. To enable States to address environmental problems of concern to communities, States may utilize flexibility in the RCRA CMS to deviate from their large quantity generator (LQG) requirements. RCRA facilities may cause air, surface and groundwater pollution. Because these facilities are frequently associated with industrial operations, surrounding communities are often low income and minority.

Issues of emerging environmental concern to EPA and communities are listed here. These focus areas should be considered a high priority for Regions and States when developing strategies for targeting compliance assurance work. These should also specifically be discussed between States and Regions when developing plans for respective activities in the Region. The areas of concern are:

- Surface Impoundments: EPA, with support from States, continues to focus on problems associated with illegal disposal of hazardous waste in unlined surface impoundments. There are thousands of industrial surface impoundments across the country, many of which adversely impact communities through air, surface water, and/or groundwater contamination, particularly in the chemical manufacturing and petroleum refining sectors.

- Centralized Waste Treatment Facilities: These facilities conduct treatment of industrial solid waste from third-parties. Through recent inspections, EPA has identified several such facilities that were grossly mismanaging hazardous wastes, and treating and discharging these wastes without permits.

- Hazardous Waste Recycling Facilities: EPA supports the environmentally beneficial recycling of hazardous wastes and secondary materials. However, sham recycling and recycling not done in compliance with RCRA requirements can result in significant adverse impacts to human health and the environment. This area of concern will include a focus on zinc fertilizer manufacturing that uses hazardous waste in the production process.

- Coke Manufacturing: There are approximately 20 coke manufacturing facilities in the United States. EPA has recently inspected and identified multi-media compliance problems at some of these facilities, including the illegal land disposal of hazardous waste. This sector produces several listed and characteristic hazardous waste streams that are excluded from RCRA if recycled without being land disposed. EPA intends to conduct focused inspections within this sector to ensure compliance.

- Waste Analysis Plans at Commercial TSDFs: EPA has conducted sampling at TSDFs to determine if the facilities' waste analysis plans and treatment of the waste were adequate. Based on the results of the sampling, concerns have been identified with the treatment and stabilization techniques and the sampling and analysis of hazardous waste treated to meet the Land Disposal Restriction (LDR) treatment standards for land disposal.

- RCRA Corrective Action: To help achieve the RCRA Corrective Action 2020 Goals, EPA and authorized States should focus enforcement resources on facilities that have not made meaningful progress in achieving remedial objectives, and on financially marginal or bankrupt facilities. Regions should use the prioritization scheme set forth in the National Enforcement Strategy for Corrective Action when assessing EPA-lead facilities and prioritizing facilities for corrective action enforcement.

The Regions should:

- Provide compliance assistance, conduct compliance monitoring, and pursue enforcement to ensure that pollution problems that matter to communities are aggressively addressed.
- Regions and states are encouraged to support the OC's RCRA inspector training development effort.

- Ensure that state and tribal inspectors who inspect on behalf of EPA are trained and credentialed per *Guidance for Issuing Federal EPA Inspector Credentials to Authorize Employees of State/Tribal Governments to Conduct Inspections on Behalf of EPA* (2004).

COMMITMENT RCRA02: Project by State and Indian country, the number of LQGs, including those at federal facilities, to be inspected by the Region during the year. Each Region must commit to inspect at least six (6) LQGs in each State, and 20% of the Region's LQGs universe in Indian country, unless OECA approves a deviation from this requirement. For example, deviations are given for states with small universes where it doesn't make sense for a Region to inspect 6 LQGs per year or 20% of the Region's LQG universe in Indian country. In the Comment Section, provide the number of federal facility LQG inspections.

COMMITMENT RCRA02.s: Project by State the number of LQGs to be inspected by the State during the year. At least 20 percent of the LQG universe should be covered by combined federal and State inspections unless an alternative plan is approved under the RCRA CMS.

The RCRA corrective action financial responsibility measure includes the review of financial test submissions received by the States within each Region. For those States that are not authorized for corrective action, the Regions should be reviewing the financial test submissions as part of EPA's role of implementing and enforcing the corrective action program in unauthorized States. Regions conducting financial test/corporate guarantee reviews for the RCRA Subtitle C closure/post-closure regulatory program may also review any corresponding corrective action submissions as part of the completion of this program measure.

COMMITMENT OSRE04: For 100% of the financial test submissions received each fiscal year for corrective action with cost estimates over $5 million, determine whether the submission is in compliance. Where the submission is noncompliant, take appropriate enforcement action to address noncompliance (e.g., notice of violation). If possible, return facility to compliance by end of fiscal year.

b. RCRA Underground Storage Tank (UST) Subtitle I Program

A major focus of the RCRA UST program is to maintain an enforcement presence concerning leak prevention, leak detection, corrective action, closure, and financial responsibility violations. EPA is committed to ensuring facilities operate underground storage tanks (USTs) in a manner that is protective of human health and the environment. Agency compliance assurance and enforcement activities will focus on those facilities posing the greatest risk to human health and the environment. Regional enforcement efforts should ensure that owner/operators of RCRA Subtitle I regulated facilities properly prevent and detect releases and take appropriate corrective action when releases occur.

EPA directly implements the UST program in Indian country in coordination with Tribes and tribal consortia because RCRA precludes EPA from authorizing tribal UST programs.

Authorized States have primary responsibility for determining facility compliance, ensuring adequate inspection coverage of the regulated universe, taking appropriate actions in response to non-compliance, and playing a vital role in alerting EPA to regulatory implementation problems.

Generally, federal compliance assurance and enforcement will complement and provide oversight of state activities. Although States with approved programs have primary responsibility for monitoring compliance and initiating enforcement actions against violators of the UST requirements, Regions should inspect and initiate federal enforcement cases to supplement and support state efforts. Federal involvement or support can provide significant benefits by addressing noncompliance from a national or corporate-wide perspective, facilitating compliance efforts involving multiple States and/or Regions, and enhancing public awareness in a broader, more national forum.

Regions should:

- Target UST inspections that will produce the greatest environmental and human health benefits (e.g., leak prevention, leak detection, corrective action, and financial responsibility). Factors to consider in identifying facilities for inspection under the UST program include:

    - Owners and operators of USTs located in Indian country;
    - Owners and operators with UST facilities in multiple states;
    - Mid-level distributors with multiple UST facilities;
    - Problem noncompliers; (i.e.; repeat violators; owners/operators who fail to cooperate in an effort to return to compliance);
    - Owners and operators of facilities with USTs that endanger sensitive ecosystems or
    - sources of drinking water; and
    - Corporate, government-owned, and federal central fueling facilities.

- Regions are expected to take enforcement actions and assess penalties, as appropriate, to ensure optimum deterrence effect and compliance impact. Regions will consult with the States on use of the delivery prohibition, when appropriate, to address significant noncompliance. It is recognized that this tool may not be an option for States and Tribes that do not have delivery prohibition programs or are not State Authorized Programs. Focus on developing large complex cases involving noncompliance on a corporate-wide basis or noncompliance in multi-state operations.
- Focus on comprehensively evaluating corporate compliance and fully developing cases involving noncompliance on a corporate-wide basis or noncompliance that occurs at facilities located in multiple states.

5. Reset Our Relationships with States

RCRA compliance monitoring is a collaborative effort between OECA, Regions, and authorized States. Each of these entities performs complementary but distinct roles. OECA provides national program leadership, and oversight of Regional and state programs, aimed at increasing program effectiveness and national consistency.

Regions and authorized states should:

- Ensure the most serious environmental problems caused by noncompliance are addressed. Regions should accomplish this primarily through annual planning with States, State program oversight, strategic and targeted federal inspections and enforcement in States, and through direct implementation in Indian country. Regions provide capacity-building support to States on complex or multi-state issues; and consult with States to identify compliance problems that may warrant areas of national focus. Regions should meet and consult regularly (for example, quarterly) with each authorized State to maintain communication on progress towards meeting annual permitting and enforcement commitments, enhancing program performance and ensuring fairness and a level playing field.
- Take action to ensure serious violations are addressed where states are not meeting performance expectations. Regions should focus oversight resources on the most pressing performance problems in States and should work to demonstrably improve state performance through these actions. Regions need to take action where States are not addressing serious violations to communicate necessary improvements to state programs in order to achieve goals of the federal environmental laws and ensure a level playing field between States.
- States are encouraged to report to the regions and OECA, any patterns of noncompliance they may identify through their inspections or other activities.
- Consistent with EPA's Policy on *Consultation and Coordination with Indian Tribes; OECA's Guidance on the Enforcement Principles Outlined in the 1984 Indian Policy (January 17, 2007)*, the Regions should consult, as appropriate, with potentially impacted tribal governments when conducting inspections and addressing noncompliance at tribal and non-tribal facilities in Indian country.

RCRA Corrective Action

RCRA corrective action is implemented by EPA and 43 authorized States and territories. The National Enforcement Strategy for Corrective Action (NESCA) encourages EPA and States to continue to work in partnership to achieve the 2020 Corrective Action goals and emphasizes the need for close communication and coordination between EPA and States to meet this goal. Regions should be working closely with their State partners to implement NESCA. NESCA provides guidance to Regions and States for targeting enforcement efforts and to address special considerations that arise in the enforcement arena, such as ensuring enforceable requirements and deadlines in permits and orders are clearly identified and included, dealing with companies having financial difficulties, using CERCLA authorities, ensuring institutional controls are effective and enforceable and long-term stewardship requirements are met, and increasing the transparency and community involvement of enforcement efforts. OECA will continue to provide training to both Regions and States on how to review financial test and corporate guarantee submissions for compliance. After 18 months of implementing NESCA, EPA and its State partners plan to assess the contribution of NESCA in achieving progress toward the 2020 Corrective Action Goals. Necessary modifications to NESCA will be made and additional tools and guidance documents may be developed as a result of this assessment.

6. Improve Transparency

At the end of the fiscal year or when otherwise available, OECA will make essential information, such as the following, available to the public via OECA's web page, or by other means:

- Results of the State Review Framework;
- Results of the Annual Commitment reporting;
- Results and highlights of compliance assistance efforts; and
- Highlights of significant EPA and State enforcement actions.
- Regions are expected to use their own comparable existing mechanisms to inform the public. States are encouraged to do likewise.
- Compliance data should distinguish State information from Indian country information.
- Information should be made available to communities, including Tribes, who lack access to the internet.

7. Relevant Policies and Guidances

Additional information about OECA's RCRA programs can be found at:
http://www.epa.gov/compliance/monitoring/programs/rcra/index.html
http://www.epa.gov/compliance/civil/rcra.html
http://www.epa.gov/compliance/cleanup

B. Toxic Substances Control Act (TSCA)

The Toxic Substances Control Act of 1976 provides EPA with authority to require reporting, record-keeping and testing requirements; and restrictions relating to chemical substances and/or mixtures; and the production, importation, use, and disposal of specific chemicals, including lead-based paint, polychlorinated biphenyls (PCBs), and asbestos.

OECA addresses toxics problems through the following TSCA programs:

- TSCA New and Existing Chemicals Programs (note: the term New and Existing Chemicals Programs describes TSCA section 4, 5, 6, 8, 12 and 13), Subchapter I, otherwise known as "core TSCA."
- TSCA Lead-based Paint (LBP) Risk Reduction Program
- TSCA Legacy Chemicals Program (PCBs and Asbestos Program which includes Worker Protection Standards, the Model Accreditation Plan Program and the Asbestos Hazard Emergency Response Act (AHERA))

Beginning in 2012, the TSCA programs will be managed nationally as one program rather than 4 distinct programs. The purposes of this change are to better leverage limited TSCA resources, better coordinate enforcement activities across Regions and amplify the inspection and enforcement presence. How these goals will be accomplished is discussed in the specific TSCA sections below.

For Regional ACS planning purposes, Regions should target their 2012 TSCA ACS commitments using a baseline of the last 3 years of their cumulative TSCA accomplishments

(combined lead, new and existing chemicals, PCBs, and asbestos activities). If FY10 was representative of the last 3 years of activity, it can be used as the baseline. Regions are expected to have some investment in the TSCA program annually. The regions should then apply the following recommended resource allocations:

The Regions should then apply the following recommended resource allocations:

- 60% of Regional inspections/enforcement actions should focus on lead based paint with the majority being the Renovation, Repair and Painting (RR&P) rule.
- 25% of Regional inspections/enforcement actions should focus on PCBs including used oil;
- 10% of Regional inspections/enforcement actions (for invested Regions) for New and Existing Chemical should focus on Action Plan Chemicals or other targeted priorities;
- 5% of Regional inspections, should focus on asbestos in schools and commercial and state buildings in states without the Occupational Safety and Health Administration (OSHA);
- The region can deviate from this proposed allocation by up to 10% to allow for flexibility for an investment in regional priorities (i.e., Region 5 PCBs in natural gas, Region 2 PCBs in schools, etc.).
- If flexibility beyond the recommended allocations above is needed, Regions should contact OC to discuss.

COMMITMENT TSCA01: Project the number of FY2012 TSCA inspections.

1. Link with Office of Chemical Safety, Pesticides, and Prevention's Top Priorities

OECA addresses the Office of Chemical Safety, Pesticides, and Prevention (OCSPP) priorities for TSCA programs in the following way:

- **Reduce Lead Risks**: OECA provides overall direction to Regions and authorized states, territories and tribes to promote compliance with all of the LBP rules with a significant focus on the (RRP**)** rule.
- **Assess and Reduce Risks from New and Existing Chemicals**: OECA focuses on compliance with TSCA Section 5 with a particular focus on short chained and other chlorinated paraffins, and other priority or Action Plan chemicals.

2. Aggressively Go After Pollution Problems That Make a Difference in Communities

TSCA's enforcement programs are significant to communities because they address chemicals that can pose serious risks to human health. Lead-based paint is particularly dangerous to children: exposure may cause reduced intelligence, learning disabilities, behavior problems and slowed physical development. Because LBP is found in pre-1978 buildings, it is more common in communities predominated by older housing, which usually are low-income, minority and EJ communities. Asbestos in schools, if not properly managed, can expose children, teachers and

other school staff to harm that may not manifest for years. PCBs bioaccumulate and thus cause a variety of adverse health effects. Asbestos and PCBs are also generally found in older buildings. Additionally, PCBs are generally found in older transformers, capacitors and some hydraulic equipment and more recently in recycled and used oil. Inappropriate abatement and disposal of asbestos and PCBs can be dangerous.

A national compliance monitoring strategy (CMS) for the TSCA program is being developed in FY2011 that will include monitoring expectations, including ACS commitments, for regions in FY2012. The CMS will cover all aspects of the TSCA compliance program.

a. TSCA New and Existing Chemicals Programs

The TSCA New and Existing Chemicals Program is exclusively a Federal program that provides for review of the toxicity of chemicals prior to their manufacture and importation to prevent unreasonable risk to human health and the environment. To assist the regions in targeting inspections, OECA commits to working with OCSPP to obtain lists of facilities for targeting inspections. Regions implementing the New and Existing Chemical Program should:

- Focus TSCA compliance activities on chemical manufacturing, distribution, processing, use, or disposal in emerging technologies and/or use of new chemicals.
- Through inspections and enforcement actions as appropriate, focus on ensuring facility compliance with:
    - TSCA 5 - new chemicals requirements such as Pre-manufacturing Notice (PMN); Significant New Use Rules (SNUR's); Low Volume Exemptions (LVE's), and on chemicals of concern including short chained and other chlorinated paraffins, and other priority or Action Plan chemicals or targets.
- Target existing chemical reporting and record keeping requirements such as s TSCA 8(c),(d) and(e) and the Inventory Update Rule;
- Evaluate and prioritize tips and complaints and follow-up as appropriate. Targeting for future inspections based on credible leads from tips and complaints should also be considered. Regions implementing this program are also expected to follow-up on all referrals received from headquarters, States, Tribes, and the public. Regions not implementing this program should refer tips and complaints the Waste and Chemical Enforcement Division within the Office of Civil Enforcement.
- Obtain information through inspections and/or subpoena as appropriate. Initiate civil enforcement actions, as appropriate, to bring facilities into compliance.

b. TSCA Lead Risk Reduction Program

Recent data show that tremendous progress has been made in the continuing effort to eliminate childhood lead poisoning as a public health concern. Based on data from the Centers for Disease Control (CDC), EPA has measured progress by tracking reductions in the number of children with elevated blood lead levels (EBLLs) of 10 micrograms per deciliter or higher. Data released in 2009 by the CDC indicate that the incidence of childhood lead poisoning, as defined above,

has declined from approximately 1.6 percent of children in 2002 to 0.9 percent of children in 2006.

At the same time, however, new data are revealing adverse health effects to children at lower lead levels than previously recognized. Thus, even though initial gains have been encouraging, EPA wishes to achieve further reductions in the incidence of children with these lower, but still significantly elevated BLLs. Monitoring and enforcement efforts to promote compliance with LBP rules, particularly the RRP Rule, advance the goal of eliminating and preventing LBP hazards, which are the primary single cause of childhood lead poisoning. These efforts, thereby, support the Agency's mission to eliminate childhood lead poisoning.

Authorized states, territories, tribes, and Regions are expected to:

- Participate in and support the national RRP compliance/enforcement strategy (under development). The strategy establishes a sequence of coordinated activities aimed at promoting compliance among specific sectors of the universe regulated by the RRP Rule, and the pre-renovation education rule (PRE Rule)(§ 745.84), which is a component of the RRP Rule. In implementing the national strategy, Regions are expected to focus their RRP/PRE efforts in high-priority geographical areas with significant or wide-spread childhood lead poisoning (e.g., lead "hot spots"). Also, in those geographical areas, Regions should employ integrated strategies to monitor, enforce and achieve compliance with the other components of the LBP program: the § 1018 disclosure rule (745 Subpart F), and § 402(a) abatement rule, as appropriate for the Region and state/tribe.

- Also, Regions should:
    - Conduct at least 60 percent of LBP inspections for compliance with pre-renovation education (PRE) requirements (§ 745.84), RRP recordkeeping and reporting requirements (§745.86), or work practice standards through on-site inspections (§§ 745.85 and 745.227).
    - Conduct no more than 40 percent of LBP inspections for the § 1018 disclosure rule (§ 745 Subpart F).
    - Section 1018-only inspections should be minimized, and linked with other LBP compliance inspections whenever practical, to provide a more comprehensive approach to addressing compliance with all applicable LBP regulations.
    - Initiate civil enforcement actions, as appropriate, and whenever necessary to protect communities by addressing and ultimately resolving violations of the RRP rule, PRE Rule, Disclosure Rule, work practice standards (§§ 745.85 and 745.227), and recordkeeping and reporting requirements (§§ 745.86 and 745.227(i)).
    - Regions should work with authorized states and tribes to ensure they are familiar with national guidance and implement their programs consistent with the guidance.

In addition, Regions should:

- Conduct targeting consistent with the national RRP strategy, including the identification of geographical lead poisoning hot spots.

- In areas where Regions conduct integrated strategies as part of the national RRP strategy or otherwise, include methods to better target compliance activities, such as partnering with state/tribal and local health departments and health care providers to identify lead hot spots and individual properties associated with EBLL children.
- Work with their LBP program counterparts to encourage states/tribes to seek authorization for the RRP program.
- Conduct appropriate oversight of authorized state/tribal Section 402 and 406 programs.
- Because of variations in housing arrangements at federal facilities, particularly at some military bases, regions should closely investigate the applicability of the LBP regulations to the particular facilities housing.

c. Legacy Chemicals Program (PCBs and Asbestos)

The Legacy Chemicals Program attempts to lessen chemical risk and exposure through reductions in use and safe removal, disposal and containment of certain prevalent, high-risk chemicals, known generally as legacy chemicals. Some of these chemicals were used widely in commerce and introduced into the environment before their risks were known

TSCA PCBs

PCBs are a persistent toxin (PBT) that bioaccumulates in food chains and poses serious risks to human health and the environment. Although PCB manufacture is banned, certain uses (transformers/capacitors) continue to be allowed under conditions which ensure that PCBs are managed properly and not released into the environment. PCBs have also been identified in building materials (caulk, paint, and insulation) and electrical equipment (fluorescent light ballast capacitors and potting materials) used in schools, raising concerns over potential exposure to school children, teachers, and other school staff. PCBs (including export for disposal) are of international concern. In 2012, Regions are encouraged to identify, inspect and take enforcement action on used or recycled oil containing PCBs. Over the past several years there has been a significant quantity of fuel and other oil containing PCBs due to improper management. For this reason, we are suggesting targeting PCBs in oil.

Regions are expected to:

- Follow-up on tips and complaints based on potential risk, including spills. Response may include referral to States that have TSCA PCB compliance monitoring grants for further investigations.
- Use targeting tools to identify the most important PCB sources, including PCBs in oil, to conduct inspections in each state and Indian country, including use of screening tools/approaches, such as the Environmental Justice Strategic Enforcement Assessment Tool (EJSEAT), and other information, such as community input. For States with TSCA PCB grants, investigative work may be provided by the State rather than EPA.
- Each comprehensive strategic plan should describe at a minimum, how the Region will cover all significant PCB commercial storage and disposal facilities within the plan's cycle. These inspections may be conducted in conjunction with RCRA TSD inspections provided the inspector comprehensively evaluates compliance with both programs.

- Continue to implement use of PCB Tablets and PCB inspection software in inspections.

TSCA Asbestos

Asbestos may be present in schools and, if disturbed and released into the air, poses a potential health risk to school children, teachers, custodial staff, and others in the school. There are no immediate symptoms of exposure; health effects may manifest 15 or more years after exposure. EPA requires Local Education Agencies (LEAs) to inspect for asbestos. When asbestos is found, LEAs must provide notification to parents and teachers, develop and implement management plans so that asbestos is not disturbed, or is properly removed, during renovations or other activities (i.e., drilling to install electrical or communications lines).

In addition, the TSCA asbestos worker protection regulations offer protection for certain state and local government employees who are not protected by the Asbestos Standards of OSHA. Employees who are involved in asbestos related construction activities, certain custodial activities, or certain activities associated with asbestos-containing brakes and clutch plates are employed in occupations that pose an increased risk of potential exposure to asbestos. State and local government employers must ensure that the employees engaged in these potential asbestos exposure activities comply with applicable OSHA standards in order to ensure their employee's safety and minimize the potential for exposure to asbestos fibers while performing their job functions.

Authorized States, Tribes, and Regions are expected to:

- Within a reasonable period of time, investigate and respond (including taking enforcement action where appropriate) to any tips/complaints containing allegations that provide a reasonable basis to believe that a violation has occurred. Response may include referral to States that have TSCA asbestos compliance monitoring grants.
- Conduct inspections and take appropriate enforcement action in each State and in Indian country to assure equitable protection and ensure compliance with the TSCA asbestos regulations. State inspections under the TSCA Asbestos/AHERA grant can provide coverage for those States instead of the Region.
- States that have "waiver" status should enforce under their state law. States that are "non-waiver" will forward their inspection reports to the regional office for appropriate enforcement action, as necessary.

In addition, Regions are:

- Encouraged to conduct compliance inspections (as an alternative to inspections of LEAs) at state and local government facilities to monitor compliance with the asbestos worker protection requirements in states where state and local government employees are not protected by the Asbestos Standards of the OSHA;
- Encouraged to coordinate, as appropriate, TSCA asbestos inspections at LEAs with inspections being conducted under other TSCA programs (e.g., lead, PCB in caulk) and/or CAA asbestos NESHAP inspections;

- Encouraged to provide adequate oversight of state/tribal programs; and
- Encouraged to target inspections at LEAs with: building stock of an age that is more likely to contain asbestos, particularly those that are undergoing renovation or energy efficiency upgrades that may disturb asbestos; at LEAs that have never been inspected; at LEAs that have not been inspected within the past ten (10) years; at LEAs that have previously been found in violation and/or been subject to enforcement action; and at private, religious, and charter schools. Websites for TSCA Asbestos Information on LEAs:
    - Department of Education – Public School LEAs: http://nces.ed.gov/pubs2010/pesagencies08/tables.asp
    - US Charter Schools – Current number of Charter Schools, by State: http://www.uscharterschools.org/pub/uscs_docs/sp/index.htm
    - Parochial School and Diocesan Locator: http://www.ncea.org/news/SchoolDiocesanLocator.asp and http://www.catholicusa.com/catholic_schools_online/catholic_schools.htm

- Required to ensure that state and tribal inspectors who inspect on behalf of EPA are trained and credentialed per *Guidance for Issuing Federal EPA Inspector Credentials to Authorize Employees of State/Tribal Governments to Conduct Inspections on Behalf of EPA* (2004);
- For inspections conducted with EPA credentials, review and provide feedback that addresses the quality of the inspection/reports and the action taken by the Region, if any.

3. Reset Our Relationships with States

The Regions should work with States and Tribes to identify any obstacles to implementation of the expectations above and work to resolve them. This includes convening routine and regular meetings between the Region and States to discuss progress towards meeting annual program and enforcement commitments, and how the State has been performing overall in its implementation of the program.

The Grants Administration Division issued guidance for the TSCA grants program that becomes effective on October 1, 2012. This guidance requires that negotiated grant workplans prominently display the following three Essential Elements: Essential Element 1 - Strategic Plan Goal; Essential Element 2 - Strategic Plan Objective; and Essential Element 3 - Workplan Commitments plus time frame. Regional Program Offices must electronically enter workplans and progress report information into an IT application currently being developed.

Where States are not meeting performance expectations, Regions should take action to enforce to address serious violations. Regions should focus oversight resources to the most pressing performance problems in States and should work to demonstrably improve state performance through these actions. OECA and the Regions will use a variety of mechanisms to ensure adequate oversight, including regular meetings and consultations with States/Tribes, grant reviews and oversight inspections.

Regions should provide:

- Regional updates on actions and outcomes through discussions with OECA (generally, through existing channels of communication).
- Assurance that authorization agreements, which authorize employees of state and tribal governments to conduct inspections on EPA's behalf, are in place with States and Tribes that receive TSCA Compliance Monitoring grants for PCBs, and that training requirements are met.
- Review of state inspection reports, feedback to States, and enforcement actions as appropriate, where inspections are conducted by States with EPA credentials. Additionally, Regions should provide reports to OECA in accordance with Guidance for Issuing Federal EPA Inspector Credentials to Authorize Employees of State/Tribal Governments to Conduct Inspections on Behalf of EPA (2004).
- Consultation with Tribes on the central role that enforcement and compliance plays in EPA's direct implementation program and oversight of approved tribal programs.

On a program specific basis:

a. TSCA Lead-Based Paint Program (LBP)

To ensure national consistency, OECA's role is to provide appropriate oversight of Regional LBP programs.

- Regions should focus primarily on State/Tribal program oversight and capacity-building to ensure States and Tribes are appropriately using tools to help ensure compliance, and more importantly, integrating those tools to help effectively reduce elevated blood lead levels (EBLLs) and LBP hazards in identified "hot spots"; support States/Tribes on complex or multi-State/Tribal compliance issues; and consult with States/Tribes to identify issues that may warrant areas of national focus in federal jurisdictions.

b. PCBs

- Obtain early phase-out of PCBs as a condition of settlement.
- Continue the use of electronic technology in the field.

c. TSCA Asbestos

- Encourage States and Tribes to develop their own regulations and apply for a "waiver" where applicable.
- Ensure that authorization agreements, which authorize employees of state and tribal governments to conduct inspections on EPA's behalf, are in place with states/tribes that receive TSCA Compliance Monitoring grants for TSCA Asbestos (non-waiver states only).

4. Improve Transparency

The Regions should:

- Work with the States and Tribes using EPA credentials to ensure that the data on inspections they conduct on EPA's behalf is input into national databases. For waiver States, ensure compliance and enforcement data are provided in aggregate form as part of midyear and end of year evaluation reports. (Not applicable to lead program.)
- Enter all federal inspections (including ICDS) and enforcement cases into ICIS.
- Publicize regional enforcement actions taken through press releases.
- Distinguish state compliance data from Indian country information.
- Make information available to communities, including Tribes, who may lack access to the internet.

5. Relevant Policies, and Guidances

Additional information about OECA's TSCA programs can be found at:
http://www.epa.gov/compliance/monitoring/programs/tsca/index.html
http://www.epa.gov/compliance/civil/tsca/index.html
http://www.epa.gov/compliance/monitoring/programs/tsca/asbestoes.html

C. Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)

EPA and the public rely on pesticide manufacturers and formulators to provide accurate information about pesticides and associated risks. Unregistered and ineffective pesticides, as well as products making false or misleading public health protection claims, pose a potential public health threat when the public makes inappropriate choices based on inaccurate or misleading information. Products used in agricultural or structural pest control settings may pose health risks to those working with or exposed to those chemicals.

A major focus of EPA's FIFRA program is to ensure compliance by pesticide registrants and to provide assistance, training, and oversight to States and Tribes carrying out FIFRA related compliance and enforcement activities under cooperative enforcement agreements. The statute gives States primary compliance monitoring and enforcement responsibility for the use of pesticides within their respective jurisdictions. Under FIFRA, EPA directly implements primary use enforcement responsibility in Indian country. However, through enforcement agreements with EPA, Tribes are allowed to enforce similar provisions under their own tribal codes.

1. Link with Top Office of Pesticide Programs Priorities

OECA addresses top Office of Pesticide Programs (OPP) priorities for the FIFRA program in the following ways:

- Effective Management of State and Tribal Grants/Cooperative Agreements: The FIFRA State and Tribal Assistance Grant (STAG) Program seeks to assist states, territories, the District of Columbia and Indian tribes in developing and maintaining comprehensive pesticide programs that address all aspects of pesticide enforcement and special pesticide initiatives, to sponsor cooperative surveillance, monitoring and analytical procedures, and to

encourage regulatory activities within the states and tribes. OECA addresses this priority in its State Grant Guidance, issued jointly with OPP.

- Pesticide Occupational Worker Safety: FIFRA's Worker Protection Standards provide critical protection to certain workers and handlers of pesticides in agricultural, nursery, greenhouse, and forestry occupations. OECA addresses this priority in both the State Grant Guidance and by including aspects of this priority in both the Fumigant/Fumigation and Worker Safety focus areas of the NPM guidance.

- Pesticide Container-Containment Regulation Implementation: Regulations covering pesticide container and containment requirements are still being phased in and most states/tribes are actively engaged in outreach and compliance assistance activities. OECA addresses this priority in its State Grant Guidance and has included it as a focus area in the NPM guidance.

- Pesticides and Water Resource Protection: Protecting water bodies from pesticide contamination helps assure the safety of those water resources. OPP has focused regulatory efforts, including establishing restrictive use requirements, on key pesticides of concern. In addition, a court ruling determined pesticides used in aquatic settings are not exempt from regulation under NPDES. Activities are underway to develop a process to bring pesticide use into compliance with the NPDES regulations. OECA recognizes protection of water resources from pesticide contamination is important and, as part of its core pesticides program, encourages the Regions to support State efforts to monitor compliance and enforce against noncompliance.

- Antimicrobial Hospital Disinfectants Efficacy/Misbranding: This area directly impacts public health by ensuring the safe and effective use of disinfectants in hospitals. OECA has been cooperating with OPP for several years in this effort and will take enforcement action on products that fail efficacy testing, taking action in accordance with the December 2009 FIFRA Enforcement Response Policy. OECA will continue to support the antimicrobial testing program through the core FIFRA compliance monitoring and enforcement program.

- Soil Fumigation Compliance Assistance: Due to a re-evaluation of the risks associated with the use of soil fumigants, OPP has required changes to product labeling and use directions for highly toxic pesticides. In addition to compliance monitoring and enforcement relating to the use of all fumigants, including soil fumigants, OECA is specifically addressing this priority in the NPM guidance through encouraging outreach/compliance assistance activities to support implementation of the new label changes for soil fumigants. Soil fumigation is included in both the Fumigant/Fumigation and Worker Safety focus areas. OECA's State Grant guidance also addresses soil fumigation through outreach, education, and compliance activities.

2. Aggressively Go After Pollution Problems That Make a Difference in Communities

EPA will ensure compliance with and effective enforcement of FIFRA regulatory requirements. The core program should include compliance and enforcement activities covering: pesticide

registration and labeling, data quality requirements (FIFRA Good Laboratory Practice Standards), efficacy and compositional integrity of hospital disinfectant products, pesticide producing establishment registration and annual production data reporting, import and export requirements, and registrant reporting of unreasonable adverse effects. The core program also supports efforts to protect human health and the environment, including water resources, through support and oversight of state and tribal monitoring and enforcement of pesticide use/misuse.

In conducting this work, Regions are expected to place special emphasis on the key focus areas identified below. All Regions are expected to participate in Mandatory Focus Areas A and B and to choose one additional area of participation from Optional Focus Areas C through F. (State and tribes with cooperative enforcement agreements may also become involved in supporting these activities, as appropriate, by including relevant activities in their negotiated cooperative agreements.)

Mandatory Focus Area A: Imports

EPA's enforcement program continues to address the illegal importation of noncompliant pesticide products into the United States by bringing enforcement actions against importers and others; providing compliance assistance to manufacturers, importers and brokers; and working with other governments, agencies and stakeholders to prevent and reduce risks of unsafe products entering our country.

Importation of pesticides and devices is governed by FIFRA Section 17(c). All imported pesticides intended for use in the United States must be registered as required by Section 3 of FIFRA before being permitted entry into the U.S. Pesticide devices that are imported, although not required to be registered, must be produced in a registered producing establishment, and must not bear any statement, design, or graphic representation that is false or misleading in any particular. Pesticides and devices must be properly labeled in accordance with FIFRA and Title 40 of the Code of Federal Regulations, Section 156. When importing pesticides or devices to the U.S., the importer must submit to the appropriate EPA regional offices on EPA Form 3540-1 "Notice of Arrival (NOA) of Pesticides and Devices." Department of Homeland Security/Customs and Border Protection (CBP) regulations prohibit the importation of pesticides without a completed Notice of Arrival (NOA).

Illegal pesticide imports include a wide range of products, such as naphthalene mothballs and related products (moth tablets, clothes hangers and urinal cakes), chlorine pool disinfectants, insecticidal chalk, roach killers, mosquito coils and rat poisons. Illegal pesticide imports, which can present significant human health and environmental risks; have been linked to poisonings of children and pets resulting from use of these products.

EPA Regions will be the primary source of inspections and enforcement for this focus area. States may become involved through Region-to-State referrals to monitor import compliance, or States may encounter imported products during the course of their other compliance monitoring inspections. EPA should make their States aware of EPA's strong interest in import compliance and be should encourage them to cooperate and collaborate with EPA when situations warrant.

Regions should work with U.S. Customs and Border Protection (USCBP) to identify pesticides and/or pesticide devices in violation of FIFRA and prohibit illegal imports from entering the U.S. channels of trade. Regions should conduct pesticide import inspections based on identified targets at border crossings and other ports of entry, conduct sweeps and take samples, when appropriate.

In addition, Regions should:

- Monitor import compliance through inspections at the designated destination point for the imported products. Such inspections would be conducted after the imported pesticides have cleared U.S. Customs and have entered into the country.
- Place special emphasis on compliance in Foreign Trade Zones.
- Focus on importers with a history of noncompliance or significant importation activity from countries frequently associated with noncompliant shipments.
- Screen for potential discrepancies concerning country of origin sources for active ingredients used to produce registered pesticides while reviewing Notices of Arrival (NOAs). Where potential discrepancies are noted, follow-up production establishment inspections (PEIs) may be warranted to further investigate the matter.
- Conduct educational campaigns in urban neighborhoods that are at high risk for using illegal imports to facilitate reporting of tips/complaints from the public about the sale/distribution of illegal pesticide imports.
- Take enforcement actions, as appropriate, to ensure optimum deterrence effect and compliance impact.
- Address noncompliance by taking enforcement action against violating import shipments and then, when appropriate, develop cases that address corporate-wide noncompliant behavior.

Mandatory Focus Area B: Supplemental Registrations

Supplemental registrations are a continuous source of concern for regulators across the country. States, which conduct thousands of marketplace inspections each year, have raised concern over these labels for years, citing them as a major source of noncompliance. Supplemental registrations are distributor labels approved for marketing as a sub-registration to a registered pesticide. These products are marketed by the distributors using labels that are slightly modified versions of the base product label. Although required to be consistent with the labels of the basic registered products, distributors have frequently deviated substantially from the accepted labels. Such unapproved revisions to the labels and product labeling can lead to misuse and misapplication as well as pose significant risks to the users who rely on product labels to inform them about proper and safe pesticide use. These labels have not historically been closely monitored through the Agency's pesticide registration process. Due to the potential risk associated with the use of improperly labeled pesticides, it is important that EPA aggressively pursue compliance for supplemental registrations.

Supplemental registrations have been issued for a wide range of pesticide products, including agricultural chemicals, pesticides used for residential pest control, lawn and garden pesticides, as well as for disinfectants and other antimicrobial products. They also represent pesticides in every toxicity category from Tox 1 Restricted Use Pesticides to minimal risk products.

To address noncompliance in this focus area, emphasis will be placed on targeting registrants with a large number of current supplemental registrations or registrants marketing Tox 1 category pesticides under distributor brand name labels and doing a comprehensive review of those distributor label products. Product compliance will be determined through comprehensive review of product labels and labeling and product chemistry, when appropriate.

Each Region will conduct PEIs and other marketplace inspections, as appropriate, and as coordinated with the states, to monitor compliance in this focus area. States may wish to participate, too, and can be a significant source of information about noncompliant supplemental registration products.

Regions should monitor for label/labeling compliance, product composition, and compliance with the provisions as described in to 40 CFR § 152.132, including the restrictions on where and how a supplemental distributor pesticide may be produced and packaged. This should include any contract manufacturing agreement(s) that should be in place.

Enforcement actions should be developed to address corporate-wide compliance and not focus on a single product noncompliance. In addition, Regions should coordinate with the Office of Civil Enforcement's Waste Chemical Enforcement division and other Regions in developing corporate-wide cases.

Regions are expected to take enforcement actions, as appropriate, to ensure optimum deterrence and compliance impact.

Optional Focus Area C: Fumigants/Fumigation

Fumigants are a class of highly toxic pesticides that are efficacious in a gaseous stage, making them very hazardous to handle and use. These products have a wide range of application use, including treatment of residential structures, warehouses, transportation vehicles, grains and other agricultural commodities, and soil. Improper or inadequate use directions and safety precautions on the product labeling and improper use of these products often result in serious exposure incidents potentially leading to death or hospitalization. Due to the potential risk associated with fumigant use, it is critical that EPA and the States work collaboratively to proactively monitor compliance with existing product labeling requirements, as well as proper use of fumigant products.

In FY2008, OPP released a Reregistration Eligibility Decision (RED) that requires important label changes incorporating significant new safety measures for soil fumigant pesticides to increase protections for agricultural handlers, workers and bystanders (e.g., people who live, work, or otherwise spend time near fields that are fumigated). The RED addresses the fumigant pesticides chloropicrin, dazomet, metam-sodium/metam-potassium (methyl isothiocyanate), and methyl bromide. Labeling changes required by the RED started appearing in the market place in 2010, although EPA has delayed implementation of the second phase of required label changes. Consistent with OPP's fumigant initiative, outreach and compliance monitoring will be promoted to make users aware of future labeling changes for soil fumigants.

Although the Soil Fumigant RED addresses significant regulatory changes for those products and will require a focused effort to ensure compliance with the new safety requirements, the NPM Guidance's fumigants/fumigation focus area is not primarily targeted on soil fumigant use compliance. Instead, this focus area encompasses product regulatory compliance and use/application compliance for all areas of fumigation including structural (residential and commercial), transportation vehicles and containers, soil, agricultural commodities, and other products.

Targeting should consider production factors (facility location, production volume, and product) as well as use/application factors (use patterns of concern and volume/frequency of use). For FY2012, participating Regions are expected to implement one or more of the compliance monitoring approaches identified below and to initiate appropriate enforcement actions.

EPA has primary responsibility for monitoring compliance and initiating enforcement action against violators of pesticide user requirements where states lack primacy and in Indian country unless a Region and a tribe maintain a cooperative enforcement agreement. In addition, States have primary responsibility for monitoring compliance and initiating enforcement action against violators of pesticide use requirements (referred to as "primacy). Regions are encouraged to determine whether there are opportunities for federal cases to support state efforts and initiate federal cases that arise in Indian country. Federal involvement or support can provide significant benefits by addressing noncompliance from a national corporate-wide perspective, facilitating compliance efforts involving multiple States and/or Regions, and enhancing public awareness.

OECA will work with OPP to obtain FIFRA Section 6(a)(2) information across a broad class of pesticide fumigants including structural, grain, and soil, among others. Section 6(a)(2) information, together with information regarding fumigant incidents from the States, press and other available sources, will help target fumigant uses where an enforcement monitoring presence may significantly deter future violations.

Regions should work with their States to identify federal and state PEI opportunities, with special emphasis placed on the priority fumigants frequently involved in exposure incidents (i.e., sulfuryl fluoride, methyl bromide, aluminum phosphide, zinc phosphide, metamsodium, and chloropicrin). State PEIs can be applied toward meeting negotiated PEIs commitments within existing cooperative agreements. PEIs conducted by regional inspectors will continue to help build regional expertise. Physical sampling and analysis and documentary sampling is encouraged. Physical samples of fumigant gases should not be taken; only documentary samples of the labeling, container, and other appropriate materials should be sampled. Physical samples of non-gas fumigants can be sampled and analyzed.

Regions should work with their States to identify opportunities for fumigation use/misuse inspections in a variety of venues, with special emphasis on those use patterns frequently associated with exposure incidents (i.e., residential buildings, commercial grain elevators and granaries, on-farm granaries, seed warehouses, and agricultural crop soils). Where appropriate, these State inspections may be applied toward negotiated cooperative agreement use/misuse inspection commitments.

When monitoring compliance in application settings subject to FIFRA's Worker Protection Standards (WPS), such as on-farm use of grain or soil fumigants, compliance with the WPS labeling requirements should also be monitored.

Consistent with the State Grant Guidance, States should conduct education, outreach and compliance assistance activities for communicating the new labeling requirements for soil fumigants. Although implementation of the soil fumigant RED labeling requirements will focus on training and compliance assistance through FY2012, in instances of misuse or abuse, appropriate enforcement response should be taken.

EPA should engage in each of the above actions where the Region directly implements the FIFRA program, including in Indian country.

Enforcement actions should be pursued under both State and Federal authorities, as appropriate. Similarly, EPA will pursue enforcement actions under FIFRA when noncompliance arises in Indian country. Significant use or product compliance violations discovered during state or tribal investigations should be considered for referral to EPA for federal enforcement, when appropriate. Regions should work with States and Tribes to identify opportunities within existing cooperative agreements for federal involvement or case support (particularly in cases involving human exposure, death, or other serious non-compliance). Headquarters will provide assistance, as needed, to States, Tribes, and Regions in support of enforcement actions. Headquarters will develop a plan to coordinate filing of enforcement cases to ensure optimum deterrence effect and compliance impact.

Optional Focus Area D: Worker Safety

Agricultural farm workers and pesticide applicators face a disproportionately high risk of exposure to pesticides (from mixing, loading and applying pesticides; hand labor tasks in pesticide treated crops; and pesticide drift from neighboring fields). Studies show that farm worker families have higher levels of pesticide exposure than non-farm worker families (take-home exposure transfer of pesticide residues and proximity of housing to treated areas). There are 2 million farm workers in the US, over a million certified applicators, and 2–3 million noncertified applicators applying pesticides under the supervision of certified applicators. It is important to protect farm workers from occupational pesticide hazards to ensure their safety in the workplace and viability as a community.

Under FIFRA, States with primacy enforce pesticide use, including the worker protection standards. States with primacy also conduct compliance monitoring inspections. Regions are encouraged to determine whether there are opportunities for federal cases to support state efforts. Where EPA implements FIFRA, including in Indian country, the Agency enforces requirements governing pesticide use and conducts compliance monitoring inspections. Tribes with cooperative enforcement agreements with EPA may conduct compliance monitoring inspections under their own tribal codes.

To optimize the risk reduction potential of compliance monitoring, Regions are expected to place

particular emphasis on farming activities that typically involve frequent use of highly toxic pesticides, such as in fruit and vegetable production and on-farm grain and soil fumigation. Compliance monitoring and enforcement activities should include product and use inspections.

Performance expectations for an active federal cooperative compliance/enforcement role within the Worker Safety focus area include:

- Regions should work with their state and tribal partners to target federal and state PEIs (focusing on high toxicity pesticides subject to FIFRA's Worker Protection Standards (WPS) labeling requirements and associated with high-risk applications/uses such as fruit and vegetable production or on-farm grain and soil fumigation) to ensure label compliance.
- Regions should monitor use compliance in application settings (e.g., on-farm grain or soil fumigation, applications to fruit and/or vegetable crops) subject to WPS and monitor compliance with the WPS labeling requirements. Focus should be on pesticides with high risk for exposure.
- Enforcement actions should be pursued under State, Federal, or Tribal authorities, as appropriate.
- In order to optimize the deterrent impact of the enforcement action, significant misuse violations should be investigated in a comprehensive manner to determine comprehensive compliance with FIFRA.
- States and tribes should be encouraged to refer use and non-use cases to EPA, when appropriate.
- Regions are expected to work with States to identify opportunities within existing agreements for federal involvement or support (particularly cases involving exposure or death).
- Significant use or product compliance violations discovered during State or Tribal investigations should be considered for referral to EPA for federal enforcement, when appropriate.
- Headquarters will provide assistance, as needed, to States, Tribes, and Regions in support of enforcement actions.
- State and tribal inspectors who inspect on behalf of EPA must be trained and credential per *Guidance for Issuing Federal EPA Inspector Credentials for Authorize Employees of State/Tribal Governments to Conduct Inspections on Behalf of EPA* (2004)

Optional Focus Area E: Retail Marketing

Until recently, EPA has focused enforcement against the producer or registrant of violative product(s). However, retailers of noncompliant products must also comply with FIFRA. One action against a retailer may result in bringing numerous pesticides into compliance with FIFRA. Taking enforcement at the retail level, as well as at the producer or registrant level, can have a very significant impact on gaining product compliance. Deterrence likely increases due to heightened end-use consumer awareness and the adverse publicity generated against the retail store, the product, and the manufacturer.

Retail marketers of pesticide products are positioned to directly interact with the consuming public, so any enforcement action taken against products being offered for sale is quickly noted by the buying public and, as a result, purchasing patterns of the consumers can be quickly altered, thus creating a significant financial impact on all businesses with a financial interest in the distribution and sale of the pesticide product(s) involved. This provides a tremendous incentive for registrants to quickly return the product(s) to compliance so that a positive business relationship with retailers can be preserved and a positive image can be presented and/or restored with the consuming public.

Regions should focus on national or regional retail chains operating multiple stores nationwide or in a multi-state area. Such stores often market similar products throughout their network of stores so that compliance issues can have corporate-wide implications. Such consumer-based retail stores typically offer a wide variety of pesticide device products, so addressing noncompliance at this level can immediately impact multiple pesticide producers.

Alternatively, Regions may elect to target major distributors who sell directly to specialized niche markets rather than to the general public. Examples of these retailers might be distributors that sell pesticide products and other supplies directly to hospitals, beauty salons and barber shops, funeral homes, and restaurants. These industries typically do not deal directly with traditional retail outlets for their supplies but instead purchase from specialized niche distributors. These direct-retailers often handle very specialized products not commonly found in the retail stores targeted to the general public and, as a result, compliance may not be as closely monitored. Additionally, many of these retailers handle distributor-label disinfectants, a product sector which has a long history of noncompliance.

Performance expectations for the retail marketing focus area include:

- Regions should conduct compliance monitoring inspections at targeted retailers.
- Regions should work with their state and tribal partners to encourage producer establishment and marketplace inspections in support of this focus area, including targeting follow-up PEIs at producers of violative products discovered at the retail inspections. Regions may consider making inspection referrals to the states/tribes to follow-up on leads and otherwise supplement federal efforts.
- Regions are expected to take enforcement actions, as appropriate, to ensure optimum deterrence effect and compliance impact.

Optional Focus Area F: Container/Containment

To ensure effective implementation of the new container/containment regulations, Regions, states and tribes should monitor compliance with the requirements in all areas of the regulated universe and for all aspects of the container/containment rule. In particular, inspections should focus on compliance with container design and labeling, residue removal, and containment requirements for registrants, re-fillers, agricultural retailers, commercial applicators, and custom blenders, as appropriate. User inspections, conducted by states and tribes, should focus on compliance with label directions for storage, cleaning, and disposal of containers.
States and tribes have been actively addressing the new regulations and are likely to continue that emphasis under the State Grant Guidance.

For Regions electing to participate in the container/containment focus area, performance expectations include:

- Conducting compliance monitoring inspections at targeted producers, distributors, and other regulated non-user entities subject to the container/containment rule.
- Working with states and tribal partners to encourage a full range of user and non-user inspections to monitor all aspects of compliance for the container/containment rule in support of this focus area. States and tribes should be encouraged to refer significant noncompliance cases to EPA for enforcement action.
- Taking enforcement actions, as appropriate, to ensure optimum deterrence effect and compliance impact.

Commitment FIFRA-FED1: Project regional (federal) FIFRA inspections, including those at federal facilities. Each Region should conduct a minimum of ten (10) FIFRA inspections. In the Comment Section, provide the number of federal facility inspections.

3. Reset Our Relationships with States

The Regions should work with States and Tribes to implement the expectations above, including:

- Convene routine and regular meetings between the Region and State to discuss progress towards meeting annual program and enforcement commitments, and how the State has been performing overall in its implementation of the program. Note: meetings can be via conference calls but at least one meeting each year should be face-to-face. Regions may rely upon existing communications with states to meet the intent of this requirement.
- Where States are not meeting performance expectations, Regions should take enforcement to address serious violations. Regions should focus oversight resources on the most pressing performance problems in States and should work to demonstrably improve state performance through these actions. Regions need to take action when necessary to communicate what needs attention to achieve the goals of the federal environmental laws and to ensure a level playing field among States.
- Negotiate, oversee the implementation of and review state and tribal performance under the pesticide enforcement cooperative agreements following existing policy and guidance.
  When doing mid- or end-of-year reviews, include a review of cases based on complaints by farm-workers and those involving one of the NPM guidance focus areas to evaluate whether the enforcement response was appropriate.
- Provide States and Tribes targeting assistance, especially related to inspections of producer establishments.
- Consistent with EPA's Policy on *Consultation and coordination with Indian Tribes*; OECA's *Guidance on the Enforcement Principles Outlined in the 1984 Indian Policy* (January 17, 2001; and *Questions and Answers on the Tribal Enforcement Process* (April 17, 2007), the Regions should consult, as appropriate, with potentially impacted tribal governments when conducting inspections and addressing noncompliance at tribal and non-tribal facilities in Indian country.

4. Improve Transparency

Currently, OECA is exploring ways to modernize and update databases that contain information on pesticide inspections and enforcement action by state and tribal grantees FIFRA-TSCA Tracking System/National Compliance Database (FTTS/NCDB) that will improve data quality, and provide more timely data entry and public access. Regions are
expected to continue to assure the timely and accurate entry of state and tribal performance data and their own federal inspection and enforcement data.

Regions should assure timely and accurate entry of state and tribal performance data and federal inspection and enforcement data.

5. Relevant Policies and Guidances

Additional information about OECA's FIFRA programs can be found at:

http://www.epa.gov/compliance/monitoring/programs/fifra/index.html
http://wwwp.epa.gov/compliance/monitoring/programs/fifra/wps.html
http://www.epa.gov/compliance/civil/fifra/index.html

Policies and guidance pertinent to the FIFRA focus areas can be found at the following:

- FY2011-2013 Grant Guidance:
http://www.http://www.epa.gov/compliance/state/grants/fifra.html
- FIFRA Enforcement Response Policies:
http://cfpub.epa.gov/compliance/resources/policies/civil/fifra/
- FIFRA State Primacy Enforcement Responsibilities: Final Interpretive Rule:
http://www.epa.gov/compliance/resources/policies/state/grants/fifra/1983frnotice.pdf
- Procedures Governing the Rescission of State Primary Enforcement Responsibility for Pesticide Use Violations:
http://www.epa.gov/compliance/resources/policies/state/grants/fifra/1981frnotice.pdf
- EPA WPS Agricultural Inspection Guidance:
http://www.epa.gov/compliance/resources/policies/state/grants/fifra/08-10-appendix4c.pdf
- Factors To Consider When Establishing A Risk-Based Targeting Strategy For Worker Protection Outreach And Compliance Monitoring Activities:
http://www.epa.gov/compliance/resources/policies/state/grants/fifra/08-10-appendix4d.pdf
- Multilingual Labeling for Imports:
http://www.epa.gov/compliance/resources/policies/monitoring/fifra/imports/multilanglabel.pdf
- Questions and answers on supplemental labeling, effective date, registration status for labeling purposes, foreign purchaser acknowledgement statements, and confidentiality:
http://www.epa.gov/compliance/resources/policies/monitoring/fifra/imports/supplabel.pdf
- Questions and answers on research and development pesticides and active ingredient concentrations:
http://www.epa.gov/compliance/resources/policies/monitoring/fifra/imports/ai.pdf

- FIFRA Inspection Manual:
http://www.epa.gov/compliance/resources/publications/monitoring/fifra/manuals/fifra/index.html
- WPS Inspection Manual:
http://www.epa.gov/compliance/resources/publications/monitoring/fifra/manuals/wps/index.html
- Project Officer Manual: http://intranet.epa.gov/oeca/oc/ag/manual.html

D. Specific Comprehensive Environmental Response Compensation and Liability Act (CERCLA) Enforcement Program Performance Expectations

1. Link with Top OSWER Priorities

OECA addresses top OSWER priorities for CERCLA in the following ways:

- Land Revitalization: Through its Brownfields program, EPA will continue to provide for the assessment and cleanup of Brownfield sites, to leverage redevelopment opportunities, and to help preserve green space, offering combined benefits to local communities. OECA can facilitate reuse by clarifying liability at sites of federal interest (or for communities particularly impacted by the economic downturn), when perceived liability remains an obstacle and EPA involvement is critical. Brownfields are described in more detail in the Goal 3 NPM Guidance published by OSWER.

- Cleaning Up Our Communities: In an effort to improve the accountability, transparency, and effectiveness of EPA's cleanup programs, EPA initiated a multiyear effort in 2010 to better use assessment and cleanup authorities to address a greater number of sites, accelerate cleanups, and put those sites back into productive use while protecting human health and the environment. By bringing to bear the relevant tools available in each of the cleanup programs, including enforcement, EPA will better leverage the resources available to address needs at individual sites.

2. Aggressively Go After Pollution Problems That Make a Difference in Communities

EPA's CERCLA Enforcement program protects communities by requiring responsible parties to conduct cleanups, preserving federal dollars for sites where there are no viable contributing parties. Superfund enforcement ensures prompt site cleanup and uses an "enforcement first" approach that maximizes the participation of liable and viable parties in performing and paying for cleanups. EPA negotiates cleanup agreements with potentially responsible parties at hazardous waste sites and, where negotiations fail, either takes enforcement actions to require cleanup or expends Superfund appropriated dollars to clean up the sites. In some cases, EPA takes both actions. When EPA uses appropriated dollars, it takes action against any viable responsible parties to recover cleanup costs. Aggressively pursuing responsible parties to clean up sites ultimately reduces direct human exposure to hazardous pollutants and contaminants, provides for long-term human health protections and makes contaminated properties available for reuse.

As part of the Integrated Cleanup Initiative (ICI), OECA will take early and focused enforcement efforts to compel cleanup. Those efforts include increasing enforcement earlier in the pipeline at non-emergency removal action and remedial investigations/feasibility study (RI/FS) stages; expediting remedial action by holding parties accountable to negotiation timeframes and scheduled cleanup commitments; and rejuvenating the process for early identification of

responsible parties to support increased site assessment, national priorities (NPL) listings, and early enforcement activities.

Under the ICI, OECA is reaffirming its commitment to "enforcement first" in all aspects of the Superfund program (i.e., removals, remedial, long-term stewardship, etc.). Regions should continue to focus on activities that maximize PRP involvement at Superfund sites.

EPA's Superfund enforcement GPRA goals and performance expectations for FY 2012 are:

COMMITMENT OSRE-01: Reach a settlement or take an enforcement action by the start of remedial action at 99% of non-federal Superfund sites that have viable, liable parties.

COMMITMENT OSRE-02: Address all unaddressed costs in Statute of Limitations cases for sites with total past Superfund costs equal to or greater than $200,000 via settlement, referral to DOJ, filing a claim in bankruptcy, or where appropriate write-off.

COMMITMENT HQ-VOL: Volume of Contaminated Media Addressed (VCMA): As part of the Goal 5 sub-objective, Support Cleaning up Our Communities, OECA has added the following new GPRA target:

By 2015, obtain commitments to clean up 1.5 billion cubic yards of contaminated soil and groundwater media as a result of concluded CERCLA and RCRA corrective action enforcement actions.

OECA has reported VCMA for contaminated soil and groundwater media as separate measures in its annual results since 2004. The new measure combines the two and elevates them to the GPRA level. The GPRA target is a national target and regions are not required to post commitments in ACS.

In addition, the CERCLA enforcement program tracks many program-level measures. These measures and their definitions can be found in the Superfund Program Implementation Manual (SPIM) at: http://epa.gov/superfund/action/process/spim11.html.

OSWER's National Program Managers Guidance for FY2011 establishes priorities for EPA's Federal Facilities Response program: conducting cleanup and response work at contaminated sites and rendering formerly contaminated sites Ready for Reuse. EPA has Federal Facility Agreements in place at almost all Federal facility NPL sites regarding the cleanups conducted by the facilities and EPA's oversight of those cleanups. Those agreements lay out procedures for resolving disputes. Regions are expected to use the procedures of the agreements, or other applicable enforcement authorities (such as imminent and endangerment orders in applicable circumstances), when Federal facilities are not complying with the terms of the agreements or with other legal requirements. Additionally, Regions and headquarters offices should work together to get remaining NPL sites as well as new NPL sites under agreements or other legally-enforceable agreements.

Environmental justice (EJ) is a priority for OECA's waste programs, promoting healthy and environmentally sound conditions for all people. OECA will continue to integrate environmental justice into its Site Remediation Enforcement program by:

- Affirming its commitment to ensure that Regions and States use EJ criteria when enforcing RCRA corrective action requirements to meet RCRA 2020 goals.
- Affirming its commitment to ensure that institutional controls are implemented at sites in environmental justice areas of concern.
- Conducting an environmental justice review of new policy and guidance documents before they become final.

3. Working With States, Tribes and Local Communities

EPA will be implementing its Community Engagement Initiative, http://www.epa.gov/oswer/docs/cei_action_plan_12-09.pdf, designed to enhance headquarters and regional program engagement with States, local communities and stakeholders to meaningfully participate in government decisions on land cleanup, emergency response, and the management of hazardous substances and waste. The initiative provides an opportunity for EPA to refocus and renew its vision for community engagement, build on existing good practices, and apply them consistently in EPA processes. Proactive, meaningful engagement with States, local governments and communities will enable EPA to obtain better information about the environmental problems and local situations - leading to more informed and effective policies and decisions.

4. Improve Transparency

The Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) is the main database for Superfund information. The public can request specific reports by going to http://www.epa.gov/superfund/. In addition, Regions should continue to provide site-specific fact sheets, which include enforcement information, on regional web pages. Compliance data will distinguish State information from Indian country information. Information should be made available to communities and Tribes, who lack access to the internet.

SECTION VI: KEY PROGRAM PRIORITIES AND STRATEGIES TO ADDRESS ENVIRONMENTAL PROBLEMS THROUGH CRIMINAL ENFORCEMENT

1. Criminal Enforcement Priorities

The criminal enforcement program will emphasize:

- EPA's Enforcement Goals, National Enforcement Initiatives for FY 2012-13 and Regional Enforcement Priorities
- Focusing Enforcement through Case Tiering
- Integrating Environmental Justice (EJ) into case selection and prosecutions

Case Tiering. During FY 2012, the criminal enforcement program will continue to implement and refine its case "tiering" system to focus scarce investigative resources using criteria, data and methodologies linked to OECA's goals. The objective is to focus enforcement efforts by increasing the percentage of Tier 1 and Tier 2 cases, which became a GPRA measure beginning in FY 2011.

The case tiering methodology prioritizes cases based on four categories of information:

1) Human health and environmental impacts (e.g., death or serious injury),
2) The nature of the pollutant and the release, (e.g., toxic pollutant, continuing violation)
3) Subject characteristics (e.g., national corporations, repeat violators), and
4) Unique Case Factors (e.g., collaborative efforts with law enforcement partners)

Based on these factors, all cases are "tiered" with Tier 1 cases being the most important. The tier designation is used throughout the investigative process including the opening of leads, case selection and prosecution and direction of resources for case support. (Note: a case's tier classification may change as cases are investigated and additional information uncovered).

Environmental Justice: One of the main duties of EPA's criminal enforcement program is to serve and protect the most vulnerable communities by using law enforcement tools to protect their health and local environment. EJ is a critical concept in meeting that objective. Criminal enforcement will increase its use of the Agency's environmental justice tools and methodology to help identify critical criminal cases that disproportionately impact vulnerable communities. This includes continuing efforts to work with tribal law enforcement to strengthen the effectiveness of environmental enforcement in Indian country. The program will also continue to work with Agency EJ workgroups and partnerships to integrate and focus EJ efforts.

1. Link with Critical Program Office Priorities

EPA's enforcement program relies on the criminal and civil programs working closely together both at the strategic and case-specific levels to bring to bear the most appropriate enforcement tools to protect human health and the environment in each media area.

At the national level, the criminal enforcement program will continue working with civil partners in annual planning efforts and will work together to develop systems to track, encourage and reward effective cooperation. Efforts will include assessing existing information available in both criminal and civil programs and evaluating regional cooperative efforts to date. Each program will adhere to OECA's parallel proceedings policy when both civil and criminal violations are present in an individual case, and will ensure all civil and criminal staff are trained on parallel proceedings.

At the Regional level, the enforcement offices will work with the Special Agents In Charge (SACs) to continue and strengthen joint case screening, share salient information and plan how to address violations using the most appropriate administrative, civil or criminal enforcement tools.

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2. ***Strengthen Relationships with Law Enforcement Partners That Support State Environmental Crimes Investigations and Prosecutions***

The criminal enforcement program will work with the States, Regions, Tribal governments, and other law enforcement organizations as appropriate to:

- Help these organizations build capacity to pursue environmental crime and provide investigative support to state-lead prosecutions where appropriate.
- Provide targeted training to State, tribal and law enforcement partners to enhance their abilities to safely spot, report and address environmental violations.
- Continue international enforcement efforts, e.g., working with INTERPOL to combat the illegal transnational shipment and disposal of electronic waste (e-waste), work with Canadian authorities in efforts in the Great Lakes.

3. ***Improve Transparency***

The criminal enforcement program will:

- Publicize EPA's criminal enforcement efforts and successes to deter other potential violators.
- Continue to develop its use of new outreach methods such as Facebook, twitter and mobile applications to encourage the public's reporting of potential violations and to provide leads through the fugitives web site.
- Ensure that the public can continue to find information it needs about EPA's criminal enforcement efforts, including the Summary of Criminal Prosecutions, the mobile application of the Report a Violation Website and the EnviroCrimes Mapper.

SECTION VII: KEY PROGRAM PRIORITIES AND STRATEGIES TO ADDRESS ENVIRONMENTAL PROBLEMS THROUGH THE NATIONAL ENVIRONMENTAL POLICY ACT

A. Specific Federal Activities Program Performance Expectations

Federal activity compliance work focuses on three areas: fostering compliance and pollution prevention through international cooperation; assisting other federal agencies in making environmentally sound decisions which include early public involvement and transparency by complying with the National Environmental Policy Act (NEPA); and guiding EPA's own compliance with NEPA and applicable statutes and Executive Orders. This work implements two of OECA's FY 2012 goals by addressing pollution that matters most to communities and promoting transparency.

Regions should work to assure international compliance and prevent illegal trans-boundary movement of hazardous waste by:

- Improving environmental performance and cooperation in accordance with Goal 6 of the U.S./Mexico Border 2012 plan (Regions VI and IX).
- Enhancing enforcement, compliance, and capacity building efforts with Mexico and Canada relating to trans-boundary compliance monitoring on the U.S. borders for hazardous waste, CFCs, selected chemicals (e.g., PCBs, mercury), and other regulated substances (Border Regions).
- Improving performance of joint responsibilities along the border and ports of entry into the United States by working with the Bureau of Customs and Border Protection (CBP) through appropriate contact channels (all Regions).
- Promoting international environmental enforcement through participation in relevant organizations and networks, such as the Enforcement Working Group of the North American Commission for Environmental Cooperation (CEC) and the International Network for Environmental Compliance and Enforcement (INECE), and, in particular, its Seaport Environmental Security Network (regional participation as appropriate, based on subject matter).
- Reviewing the permit and compliance status of U.S. receiving facilities in connection with 100% of the notifications for the import of hazardous waste they receive from HQ EPA and, based on the review, recommending consent or objection to notifications within the time periods allowed under applicable international agreements (all Regions).
- As a regular part of Regional inspection activities, conducting periodic inspections of U.S. facilities which receive imported hazardous waste (TSDFs) and generators and other primary exporters of hazardous waste, cathode ray tubes (CRTs) and spent lead acid batteries (SLABs), based on information provided by OFA which identifies those facilities participating in import and export shipments.

Regions should implement the National Environmental Policy Act (NEPA) by:

- Fulfilling EPA's obligations under NEPA, Section 309 of the Clean Air Act, and cross-cutting laws, directives, and Executive Orders (e.g., Endangered Species Act, National Historic Preservation Act, Executive Order on Environmental Justice, Wetlands and Flood

Plains Protection) by reviewing and commenting on all major proposed federal actions to ensure identification, elimination, or mitigation of significant adverse effects, and making the comments available to the public.

- Ensuring that projects likely to have significant impacts (e.g., transportation, mountaintop mining, and energy) receive sound environmental analysis, use cooperation among agencies to resolve differences, consider environmental justice, incorporate innovation and support public involvement through a more streamlined and transparent environmental review process
- Ensuring that at least 90 percent of EPA projects subject to NEPA environmental assessment or EIS requirements (e.g., water treatment facility projects and other grants, new source NPDES permits and EPA facilities) are expected to result in no significant environmental impact.
- Ensuring that 70 percent of significant impacts identified by EPA during the NEPA review of all major proposed federal actions will be mitigated. (GPRA measure)

  Promoting Environmental Justice considerations throughout the environmental decision-making process and encouraging public involvement early in the process to maximize transparency.
- Working towards the goals laid out in EJ 2014, particularly the commitments regarding cross-Agency coordination to meet the challenges of the Executive Order.
- Fostering cooperation and collaboration with other Federal agencies and Tribes to ensure compliance with applicable environmental statutes; promoting better integration of pollution prevention measures and ecological risk assessment; and providing technical assistance in developing projects that prevent adverse environmental impacts to the Nation's land, water and air.
- Making categorical exclusion determinations or preparing environmental analyses (EISs or EAs) and posting them on the internet for EPA- issued National Pollutant Discharge Elimination System (NPDES) permits for new sources, for states/tribes without authorized NPDES programs; off-shore oil and gas sources, including permits for deepwater ports, EPA laboratories and facilities; and Clean Water Act wastewater treatment plant grants.
- Making Categorical Exclusion determinations or preparing environmental analyses (EAs or EISs) and posting them on the internet for Special Appropriation grants (including the Colonias Wastewater Construction and Project Development Assistance program) for wastewater, drinking water supply, and solid waste collection facilities; Border Environment Infrastructure Funds (for the US/Mexico Border Environment Cooperation Commission projects); and reviews conducted under "EPA's Voluntary NEPA Compliance Policy."
- Entering the results of their '309 reviews and NEPA compliance actions into the Lotus Notes EIS Tracking Database maintained by HQ OFA, and the Special Appropriations Act Projects (SAAP) system maintained by HQ OW, respectively. Additionally, Regions should report to the Office of Federal Activities quarterly on the status of their 309 reviews and NEPA compliance actions pursuant to the Government Performance Reporting Act (GPRA) reporting process, and provide other reports as may be required by the American Recovery and Reinvestment Act of 2009.

SECTION VIII: NATIONAL PROGRAM REQUIREMENTS FOR ADDITIONAL OECA PROGRAMS UNDER GOAL 5

In addition to the national initiatives and programs that can be specifically assigned to one of the four Strategic sub-objectives of water, air, waste/toxic/pesticides, and criminal enforcement, OECA has several programs that contribute to the goals of more than one sub-objective. These programs are: Multi-media, Compliance Incentives, Indian country, and Emergency Planning and Community Right to Know Act (EPCRA). In addition, OECA has specific training and state oversight program requirements.

A. Specific Emergency Planning and Community Right to Know Act (EPCRA) Program Performance Expectations

EPCRA includes two distinct programs, Community Right-to-Know under EPCRA 313 and release notification and emergency preparedness under CERCLA 103 and EPCRA 304, 311 and 312. EPA and the public rely on EPCRA for information on chemical releases entering the environment, and on the storage of chemicals at facilities. EPA, States, Tribes, local entities, and communities rely on the combined EPCRA/CERCLA information to prepare local chemical emergency response plans, and to more safely and adequately respond to chemical emergencies. EPA must ensure that companies report accurately and within required time frames. Although there is no target for assistance activities, assistance is an appropriate tool, in particular, for smaller entities who meet the reporting criteria. Regions and States should inspect facilities that may be contributing to pollution problems that matter to their respective communities, and develop enforcement cases that produce significant environmental benefits.

1. Link with Top Office of Environmental Information Priorities

OECA addresses the top Office of Environmental Information priority for the EPCRA programs by increasing compliance of non-reporters.

2. Aggressively Go After Pollution Problems That Make a Difference in Communities

A. EPCRA 313:

Regions are expected to:

- Inspect or send information request letters to enforcement targets developed by OECA with assistance from OEI for FY 2012 to address the following categories of concern as resources allow.
- Potential non-reporters (facilities that report in one year but fail to report the following year).
- Potential never-reporters (target facilities in the same sectors where a company may not have reported and a similar facility in the sector did report);
- Potential data quality issues (facilities with significant changes in release estimates from one year to the next or facilities in the same sector where a facility reports significantly more/less than a similar facility in the sector).

- Facilities that submit a Form A after having previously submitted a Form R, and concerns exist as to the accuracy of this change.
- The submission of forms with errors significant enough to prevent the input of data into the Toxic Release Inventory.

- Track and prioritize tips and complaints and follow-up, as needed. OECA may provide additional targeting as part of an initiative focused on communities, chemicals or sectors of concern.
- Any inspections resulting from any of these targeting efforts will count towards the Region's overall inspection commitments.

In addition, Regions should:

- Work with the Air, RCRA and Water compliance and enforcement programs to add EPCRA questions to information requests where appropriate, evaluate the responses, and take appropriate enforcement actions or combine with other enforcement actions.

- Review and follow-up on, as appropriate, disclosures submitted under the OECA Audit Policy and Small Business Policy.

- OECA will assist in targeting inspections, but the Regions are expected to provide legal and technical enforcement case support, and either obtain additional information through federal investigation, show cause letter, subpoena and issue appropriate federal actions as appropriate; or determine that follow-up is not necessary.

COMMITMENT EPCRA 01: Conduct at least four (4) EPCRA 313 data quality inspections.

COMMITMENT EPCRA 02: Conduct at least twenty (20) EPCRA 313 non-reporter inspections.

B. EPCRA 304/311/312 CERCLA 103

Regions should:

- Use screening and targeting tools to focus limited federal resources on national and regional priority areas. In targeting for inspections, Regions should consider the presence of significant quantities of CERCLA hazardous or EPCRA extremely hazardous chemicals, proximity to population centers, a history of significant accidental releases, and any other information that indicates a facility may be high-risk.
- Evaluate compliance with EPCRA sections 304, 311, and 31 and CERCLA section 103 during CAA section 112(r) high-risk facility inspections (as described in the CAA Section of this guidance).
- Within a reasonable period of time, evaluate and respond, if appropriate (including taking enforcement action where appropriate) to any tip or complaint containing allegations that provide a reasonable basis to believe that a violation has occurred.

- Evaluate certain continuous release submissions for accuracy and compliance and take appropriate enforcement actions for non-compliance.

3. Reset Our Relationships with States

The Regions should continue coordinating with States and Tribes.

4. Improve Transparency

The Regions should

- Enter all federal enforcement cases into national databases.
- Enter all federal civil judicial consent decrees into ICIS.

5. Relevant Policies and Guidances

Additional information about OECA's EPCRA programs can be found at:

http://www.epa.gov/compliance/monitoring/programs/epcra/index.html
http://www.epa.gov/compliance/civil/epcra/index.html
http://www.epa.gov/compliance/monitoring/programs/epcra.html

B. Compliance Incentives Program Performance Expectations

In addition to providing compliance assistance and taking enforcement actions, EPA promotes compliance through the use of the following incentive policies: (1) the policy on "Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations" (the Audit Policy); (2) "Small Business Compliance Policy" (Small Business Policy); and (3) "Small Local Governments Compliance Assistance Policy" (Small Local Governments Policy). These policies reduce or waive penalties under certain conditions for facilities which voluntarily discover, promptly disclose, and correct environmental problems. EPA encourages the use of these policies, particularly when use results in actions that reduce, treat, or eliminate pollution in the environment or improve facility environmental management practices (EMPs).

In most quarters, EPA receives slightly more self-disclosures than are recorded as resolved. Over time, this has led to an increasing inventory of unresolved disclosures. In recognition that we need to address this inventory, the Audit Policy Coordination Team (ACT), comprised of representatives from all ten Regions and Headquarters has developed a number of practice modifications, which should reduce transaction costs, streamline and speed up the processing of disclosures. In FY 2011, the Office of Civil Enforcement will continue to work with the Regions and Headquarters offices to expedite the processing and resolution of voluntary disclosures. In FY 2012, the Regions and Headquarters are expected to continue to expeditiously process voluntary disclosures in order to prevent the increase of the pipeline, as well as to reduce the inventory.

1. Aggressively Go After Pollution Problems That Make a Difference in Communities

EPA's Audit Policy, Small Business Policy and Small Local Governments Policy provide incentives for regulated entities to resolve environmental problems and come into compliance with federal laws through self-assessment, disclosure, and correction of violations. EPA is

encouraging audits and disclosures that achieve significant environmental outcomes, as well as ways to improve Audit Policy implementation.

Under various Compliance Incentive Programs (CIPs), individual entities or members of a sector disclose and correct violations in exchange for reduced or waived penalties, while the risk of enforcement increases for those not taking advantage of this opportunity. Regions in consultation with Headquarters are expected to consider the use of CIPs directed at particular sectors and/or noncompliance problems, particularly key program priorities, with emphasis on violations that impact areas with environmental justice concerns, and violations that, once corrected, are likely to result in measurable pollution reductions.

2. Reset Our Relationships with States

Regions are expected to implement EPA's compliance incentive policies (http://www.epa.gov/compliance/resources/policies/incentives), with the assistance of State, tribal, and local agencies, to encourage the regulated community to voluntarily discover, disclose, and correct violations before regulatory agencies identify entities for enforcement investigation or response.

3. Improve Transparency

EPA will continue to enter data into ICIS regarding the receipt and resolution of self-disclosures and, at the end of FY2012, EPA will continue to report on the number of self-disclosures received and resolved together with the environmental outcomes resulting from disclosing entities correcting their violations.

C. Federal Facilities Enforcement Program Performance Expectations

EPA's compliance and enforcement program involves more than 30,000 federal facilities and installations spread across nearly 30% of the nation's territory, among which are some 10,000 currently regulated under the Agency's various statutes. As such, it is one of the EPA's largest and most diverse sectors to oversee. Given limited resources, the primary focus in this sector has been on monitoring and enforcement, given stewardship opportunities and reliable compliance assistance offered by others, including at *FedCenter*, the sector's on-line environmental stewardship and compliance assistance center sponsored by more than a dozen federal agencies. Further, while these federal installations are sometimes subject to special provisions of environmental law, EPA's general practice and policy is to hold them to the same standard of compliance as private facilities. EPA's federal facilities enforcement and compliance programs are at http://www.epa.gov/enforcement/federalfacilities/index.html

FFEO, in partnership with other federal agencies, will operate and expand *FedCenter* as the central point for federal agency collaboration on greenhouse gas emission response and compliance with new Executive Order 13514 on federal sustainability.
See http://www.fedcenter.gov/

In an effort to effectively focus limited resources, FFEO and the Regional Federal Facilities Managers annually negotiate *Integrated Strategies* as part of the National Federal Facilities

Program Agenda. These integrated strategies align enforcement, compliance, and stewardship activities and help achieve environmental and health benefits by addressing those problems that matter to communities. In FY 2012, Regions are expected to continue to implement Integrated Strategies dealing with storm water, federal underground storage tanks, RCRA corrective action sites. FFEO and the regions have also identified three exploratory integrated strategy areas for FY 2012. These new areas focus on enforcement actions at Government Owned/Contractor Operated/Government Owned/Privately Operated (GOCO/GOPO) facilities, HCFCs/CFCs enforcement and an energy extraction enforcement initiative which compliments a new national OECA-wide initiative. In addition, FFEO will complete new inspection targeting capabilities for vulnerable communities and consider potential new inspection activities associated with the recently announced initiative dealing with disposal of unneeded federal real estate.

1. Aggressively Go After Pollution Problems That Make a Difference in Communities

Clean water action plan: Regions are expected to continue implementing the *Integrated Strategies* on stormwater and underground storage tanks. To support Regions in Assuring clean drinking water, especially on tribal lands, FFEO will research drinking water pollution and potential SDWA enforcement particularly at formerly used defense sites (FUDS). Regions and FFEO are expected to continue to implement an enforcement action against Bureau of Indian Affairs for violations at schools on BIA and tribal lands. In addition, FFEO will complete new inspection targeting capabilities for vulnerable communities.

Clean air: To reduce air pollution from largest sources and to support the Regions, FFEO will complete new research on power plants operating on military bases.

Climate and clean energy: FFEO, in partnership with other federal agencies, will operate and expand ***FedCenter*** as the central point for federal agency collaboration on greenhouse gas emission response and compliance with new Executive Order 13514 on federal sustainability. See http://www.fedcenter.gov/

In order to protect people from exposure to hazardous chemicals, Regions are expected to sustain a vigorous inspection and enforcement program at federal facilities. Regions and FFEO are expected to implement the *Integrated Strategy* on protecting vulnerable populations.

FFEO will continue research into non-compliance at surface impoundment sites, RCRA corrective action sites and other RCRA non-TSDF facilities. FFEO will complete new research on greater compliance/enforcement activity at FUDS. In order to reduce risks from mineral processing, Regions are expected to address contamination and cleanup at federal abandoned mine sites. In an effort to reform chemical management enforcement, Regions are expected to address issues with PCBs in ships and asbestos and pesticides at military sites. FFEO will work to secure penalty authority against federal facilities through TSCA reauthorization. In addition, FFEO and Regions are expected to continue implementing the *Integrated Strategy* on federal prisons.

FFEO strongly encourages the Regions to take enforcement actions to improve compliance at federal facilities. For FY 2012, federal facility resources should give first priority to taking

appropriate and timely enforcement actions, as defined within relevant media-specific policies, for each federal facility inspected as a consequence of Federal Facility Integrated Strategies efforts. Where appropriate, FFEO advocates including environmental management system (EMS) improvements and SEPs as part of enforcement action settlements. FFEO also urges the Regions to take timely and appropriate enforcement actions to address violations of clean up responsibilities.

Enforcement Follow Up and Projections

At mid-year each Region must project the number of formal (1) federal facility enforcement case initiations and (2) federal facility settlements for FY 2012. The projections should not include Records of Decision at federal facility CERCLA sites. Projections can include issuance of Notices of Determinations regarding self-disclosures by federal facilities. The projections should be emailed by the Regional Enforcement Division Director to the Director of OECA's Federal Facility Office at the end of the 2nd fiscal quarter. Since these projections are outside the ACS system, they are not commitments by the Regions.

Please note the reference at Section V.D on page 61 of this Guidance to OSWER's NPMG which establishes priorities for EPA's Federal Facilities CERCLA Enforcement program. Clean up at hazardous sites: Regions and FFEO are expected to work to ensure timely completion of CERCLA Federal Facility Agreements (FFA). Regions are expected to oversee compliance by federal agencies under FFAs. Those agreements lay out procedures for resolving disputes. Regions are expected to use the procedures of the agreements, or other applicable enforcement authorities (such as imminent and endangerment orders in applicable circumstances), when Federal facilities are not complying with the terms of the agreements or with other legal requirements. Additionally, Regions and headquarters offices will work together to get remaining NPL sites as well as new NPL sites under agreements or other legally-enforceable agreements.

All federal facility enforcement actions are considered nationally significant and require consultation with FFEO. FFEO will focus its resources to make these consultations timely and effective.

Regions are encouraged to target federal facilities as part of National Enforcement Initiative areas, as well as Regional priorities, national initiatives targeted at geographic areas, EJ areas and federal facilities Integrated Strategies areas. Under Sections III, IV, and V of this Guidance, each Region must report the number of federal facilities evaluations, investigations and inspections included within commitments under the various Regional media program commitments.

COMMITMENT FED-FAC05: Each Region must conduct ten (10) federal facilities inspections to support integrated strategy areas, which include stormwater; federal underground storage tanks, federal prisons; RCRA surface impoundments, RCRA corrective action sites, and vulnerable populations. These inspections can be achieved through any combination of single media or multimedia inspections with the following limitations: (1) a maximum of three UST inspections can count toward this goal and (2) a maximum of three (3) vulnerable community

inspections can count toward this goal, and (3) for any multimedia inspection conducted, it shall count as two inspections toward this goal if two of the individual inspections support the *Integrated Strategies*. These inspections may simultaneously satisfy inspections commitments required in National Enforcement Initiative or other core program areas.

2. Reset Our Relationships with States

Regions are expected to hold States accountable for responsible federal facility compliance monitoring and enforcement activity.

3. Improve Transparency

Regions are expected to share environmental information appropriately with the public for federal facility environmental violations, including through press releases for all enforcement actions, and at federal facility cleanup sites. EPA will pursue legislative changes to ensure federal agency environmental accountability under federal laws.

D. State Review Framework (SRF) Expectations

In FY 2012, Regions are asked to support the SRF in the following ways:

- Conduct Round 3 SRF reviews on state CAA, CWA, and RCRA enforcement programs, completing in FY2012 all states that did not receive a review in Round 2, and including 1 pilot state review using an integrated permit and enforcement review process in the 2nd half of FY2012. Ensure that commitments to implement significant recommendations for program improvements are captured in appropriate negotiated PPAs, PPGs, or categorical grant agreements between the Region and the State, with accountability for carrying out those commitments. SRF review results should be integrated with, and viewed and discussed with the State in coordination with permit reviews.
- Regions should use all available data to benchmark and monitor the enforcement performance of their States. Data sources include (but are not limited to) federal and state data systems, permitting and enforcement performance reviews, and other audit or evaluation reports.
- Enter both draft and final SRF reports, which include Preliminary Data Analyses, file reviews, recommendations, state comments, and benefits arising from Framework reviews, into the Lotus Notes SRF Tracker database upon completion of a SRF review.
- Monitor the progress of States and Tribes in carrying out the recommendations of rounds 1 and 2 of the SRF, and record the progress quarterly in the Lotus Notes SRF Tracker database.
- Use results of reviews to inform annual planning and regular progress meetings with States. Where progress resolving SRF recommendations are not being made, Regions should escalate their responses to state performance issues.

COMMITMENT SRF01: Develop a schedule of state reviews for the four years of Round 3 (2012-2016), completing all remaining states from Round 2 in 2012. Included in this 2012 work is conducting for one state, an integrated permit and enforcement review process. Identify the

number of Round 3 reviews to be conducted, consistent with SRF guidance in FY2012, by year and by state. Where appropriate, program improvements should be captured in appropriate negotiated PPAs, PPGs, or categorical grant agreements between the Region and the State, with accountability for carrying out those commitments. Information on SRF reviews, along with the recommendations, is to be entered into the SRF Tracker.

SRF guidances, policies, and templates for reporting are found at http://www.epa-otis.gov/srf/srf_tracking.html.

SECTION IX. FY2012 OECA WORKPLAN SUBMISSION INSTRUCTIONS

A. Annual Commitment System

Following the release of the final OECA NPM Guidance, Regions should hold discussions with States and Tribes to discuss the highest priority work across the Region ands States for the upcoming year. This work should be an integration of national, regional and state priorities, and consider permitting and enforcement activities that will lead to improvements in compliance and in environmental conditions. The Regions and States should discuss how to work together to ensure that the highest priority work gets done, including consideration of this NPM Guidance, along with guidance of other EPA programs.

Regions and States should develop draft numbers for the commitments contained in the guidance that relate to state and tribal activities. Regions should also assess their own resource levels in relation to the priority work identified in the regional/state discussions and the state and tribal contributions to that work, and the work outlined in the NPM Guidance.

OECA will hold a planning discussion with each Region at the senior management level during the spring of 2011 to discuss the strategic allocation of the Region's resources, with the goal of informing the negotiation of the ACS commitments for the Region for the coming year. OECA understands that the demands of ensuring compliance with the myriad of environmental laws and programs covered by this NPM Guidance may exceed a Region's resources, and wants to ensure that available resources are put towards addressing the most important sources and most serious violations that affect the environment and public health.

Current schedules call for Regions to enter their draft targets into the annual commitment system by July 9, 2011. By completing OECA and regional senior management discussions prior to this time, the process for resolving any issues and finalizing annual regional targets should be streamlined. During this same time, Regions should engage States and Tribes in negotiations to complete the grant process (PPAs, PPGs, and Categorical Grants), including translating regional targets into formal commitments supported by state-by-state agreements. All commitments should be final by October 22, 2011.

B. FTE Resource Charts

The Regions should complete FTE charts similar to the charts completed in previous planning cycles. Charts organize FTE information by goal, objective, and sub-objective, and then cross-walk to the media program elements. The importance of the FTE Resource Charts is significant due to increased interest from the Office of Management and Budget, the Inspector General, and Congress. Regions will receive FTE templates in August 2011. It is imperative that Regions complete these charts and submit these documents to Christopher Knopes and Lisa Raymer on September 30, 2011.

- 2011 Final – Enter the Region's final FTE allocation for FY2011 in the 2011 Final column.

- 2012 Proposed – Enter the Region's proposed FTE allocation for FY2011 in the 2012 Proposed column. Headquarters recognizes that FTE levels may change after the Agency receives the FY2011 enacted budget after October 1, 2012. Therefore this number is a "best guess" estimate.

SECTION X. 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
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 – Customs and Border Protection
CBI – Confidential Business Information
CCDS – Case Conclusion Data Sheet
CDC - Centers for Disease Control
CEC – Commission for Environmental Cooperation
CEI – Compliance Evaluation Inspection
CERCLA – Comprehensive Environmental Response, Compensation and Liability Act
CESQG – Conditionally-exempt Small Quantity Generator
CFC – Chlorofluorocarbon
CID – Criminal Investigation Division
CIPs – Compliance Incentive Programs
CMS - Compliance Monitoring Strategy
CRT – Cathode Ray Tubes
CSOs – Combined Sewer Overflows
CSS – Combined Sewer Systems
CWA – Clean Water Act

D

DARTER - Data on Aquatic Resource Tracking for Effective Regulation

DMR – Discharge Monitoring Report
DOH – Department of Homeland Security
DOJ – Department of Justice

E

EA – Environmental Assessment
EIS – Environmental Impact Statement
EJ – Environmental Justice
EJAC – Environmental Justice Areas of Concern
EJSEAT – Environmental Justice Strategic Enforcement Assessment Tool
EBLLs - Elevated Blood Lead Levels
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
ETT – Enforcement Targeting Tool

F

FCE – Full Compliance Evaluation
FEMA – Federal Emergency Management Agency
FFA – Federal Facility Agreement
FFEO – Federal Facilities Enforcement Office
FIFRA – Federal Insecticide Fungicide and Rodenticide Act
FTE – Full Time Equivalent
FTTS/NCDB – FIFRA-TSCA Tracking System/National Compliance Database
FRP – Facility Response Plan
FRV – Federally Reportable Violations
FUDS - Formerly Used Defense Sites
FY – Fiscal Year

G

GACT – Generally Available Control Technology
GAO – Government Accounting Office
GHG – Greenhouse Gas
GIS – Geographic Information System
GME – Groundwater Monitoring Evaluation
GOCO –Government Owned/ Contractor Operated

GOPO – Government Owned/Privately Operated
GPRA – Government Performance and Results Act

H

HAP – Hazardous Air Pollutant
HCFC - Hydrochlofluorocarbons
HPV – High Priority Violators
HPPG – High Priority Performance Goal
HQ - Headquarters
HUD – Housing and Urban Development

I

IAC – Innovative Action Council
ICDS – Inspection Conclusion Data Sheet
ICI - Integrated Cleanup Initiative
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
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
LVE - Low Volume Exemptions

M

MACT – Maximum Achievable Control Technology
MDR – Minimum Data Requirements
MITC - Methyl Isothiocyanate
MOA – Memorandum of Agreement
MOU – Memorandum of Understanding
MS4 – Municipal Separate Storm Sewer System
MSGP – Multi-sector General Permit

N

NAAQS – National Ambient Air Quality Standards
NEI – National Enforcement Initiative
NEIC – National Enforcement Investigations Center
NEJAC – National Environmental Justice Advisory Council
NEPA – National Environmental Policy Act
NESCA – National Enforcement Strategy for Corrective Action
NESHAP – National Emissions Standards for Hazardous Air Pollutants
NETI – National Enforcement Training Institute
NOA – Notice of Arrival
NOV – Notice of Violation
NOx – Nitrogen Oxide
NPDES – National Pollutant Discharge Elimination System
NPL – National Priorities List
NPM – National Program Manager
NRC – National Response Center
NRCS – Natural Resource Conservation Services
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
OCSPP - Office of Chemical Safety, Pesticides, and Prevention
ODS – Ozone Depleting Substances
OECA- Office of Compliance and Assurance
OEI – Office of Environmental Information
OEJ – Office of Environmental Justice
OFA – Office of Federal Activities
OGD – Office of Grants and Disbarment
OIG – Office of the Inspector General
OMB – Office of Management and Budget
OPA – Oil Pollution Act
OPP – Office of Pesticide Programs
OSHA - Occupational Safety and Health Administration
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
PMN - Pre-manufacturing Notice
POTW – Publically Operated Treatment Works
PPA – Performance Partnership Agreement
PPG – Performance Partnership Grants
PRE - Pre-renovation Education
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
RED – Re-registration Eligibility Decision
RI/FS – Remedial Investigations/Feasibility Study
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
SIP – State Implementation Plan
SGTM – State Grant Template Measures
SITS – Strategy Implementation Teams

SLAB - Spent Lead Acid Batteries
SLPD – Special Litigation and Projects Division
SNCs – Significant Noncompliance
SNURs - Significant New Use Rules
SOC – Significant Operational Compliance
SO2 – Sulfur Dioxide
SPCC – Spill Prevention Control and Countermeasures
SPIM - Superfund Program Implementation Manual
SQG – Small Quantity Generator
SRF – State Review Framework
SSO – Sanitary Sewer Overflows
STAG - -State and Tribal Assistance Grant
SWPPP – Stormwater Pollution Prevention Plan

T

TRI – Toxic Release Inventory
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
USCBP - U.S. Customs and Border Protection
UST – Underground Storage Tank

V

VCMA – Volume of Contaminated Media Addressed
VOC – Volatile Organic Compounds

W

WCED - Waste and Chemical Enforcement Division
WPS – Worker Protection Standards
WW – Wet Weather

FY 2012 Annual Commitment System (ACS) Attachment Template

ENVIRONMENTAL PROTECTION AGENCY
OECA

Opt Col	G/O/S	ACS Code	Measure Text	Non-Commitment Indicator (Y/N)	State Performance Measure (Y/N)	Planning Target	National Target (FY2011 Pres. Bud)
	5	**CAA04**	The number of compliance evaluations to be conducted by the regions at majors sources, 80% synthetic minors, and other sources (as appropriate). [Note: Region should break out evaluation projections by source classification and by compliance monitoring category (FCE, PCE, and Investigations). In the comment section, each region should also provide the number of federal facility FCEs, PCEs and investigations. Projected investigations under this commitment are those investigations initiated by the Regions for the air enforcement program outside of the National Enforcement Initiatives, and identified by the air program (e.g., MACT, NSPS).	N	N	N	N
	5	**CAA06**	Ensure that delegated state agencies implement their compliance and enforcement programs in accordance with the CAA CMS and have negotiated facility-specific CMS plans in place. The Regions are to provide the number of FCEs at majors and 80% synthetic minors to be conducted by individual state/local agencies to demonstrate program implementation consistent with CMS. However, if a delegated agency negotiates with a Region an alternative CMS plan, this Commitment should reflect the alternative plan. [Note: Break out evaluation projections (e.g., FCEs; PCEs included in alternative plan) by source classification]. Prior to approving an alternative plan, Regions should consult with the Office of Compliance (OC) and provide OC with information on how the state/local agency compliance monitoring air resources will be redirected and the rationale for making the change.	N	N	N	N
	5	**CAA07**	The Regions and delegated agencies should enter 100% of MDRs in AFS consistent with Agency policies, including the 2010 FRV Clarification, and the AFS ICR. The reporting of such complete, accurate, and timely data by delegated agencies should be reflected in written, up-to-date agreements with the Regions. If the Region is responsible for entering data for a delegated agency or Tribe, the Region should identify the delegated agency or Tribe.	N	N	N	N
	5	**CWA07**	By December 31, 2011, provide a specific NPDES Compliance Monitoring Strategy	N	N	N	N

			(CMS) plan for each State in the Region. The plan should provide universe information for the CMS categories; sub-categories covered by the CMS and combined EPA and State expected accomplishments for each category and subcategory. The plan should identify trade-offs made among the categories utilizing the flexibility designed into the CMS policy to target the most significant sources with potential to impact water quality. At end of year provide for each State a numerical report on EPA and state inspection plan outputs, by category and subcategory. To increase the transparency of NPDES inspection data, OECA will work with Regions and State associations to develop formats for releasing inspection data on CMS implementation performance on a state-by-state basis.				
	5	**CWA 09**	Regions should submit summaries of the collaborative EPA/State annual work planning process addressing NPDES permitting, compliance monitoring, and enforcement activities, including work-sharing, to the Office of Compliance and the Office of Wastewater Management by October 31, 2011 for FY 2012 activities.	N	N	N	N
	5	**CWA10**	Regions should focus their CWA enforcement work towards meeting the national target of 37% for concluding federal judicial and administrative enforcement actions resulting in a reduction of pollutants that pertain to facilities discharging into waters that do not achieve water quality standards. The regions should report their data per the November 2010 guidance issued by OECA, and any subsequent updates issued for FY2012.	N	N	N	N
	5	**SDWA02**	During FY 2012, the primacy agency must address with a formal enforcement action or return to compliance the number of priority systems equal to the number of its PWSs that have a score of 11 or higher on the July 2011 ETT report.	N	N	N	N
	5	**RCRA01**	Project by State, and Indian country where applicable, the number of operating non-governmental TSDFs, to be inspected by the Region during the year[1]. Regions must commit to inspect at least two (2) TSDFs in each State or Indian country unless OECA approves a deviation from this requirement. For example, deviations are given for states with small universes where it might not make sense for a Region to inspect two TSDFs per year. Financial responsibility is an important component of the RCRA core program and should be included as part of the inspection of each TSDF (although the financial responsibility reviews do not have to occur at the same time nor be conducted by the same people who conduct the field inspections).	N	N	N	N
	5	**RCRA01.s**	Project by State the number of operating TSDFs to be inspected by the State during the year.	N	N	N	N
	5	**RCRA03**	Inspect each operating TSDF operated by states, local, or Tribal governments.	N	N	N	N
	5	**RCRA02**	Project by State and Indian country, the number of LQGs, including those at federal	N	N	N	N

[1] Currently there is only one TSD in Indian country.

			facilities, to be inspected by the Region during the year. Each Region must commit to inspect at least six (6) LQGs in each State, and 20% of the Region's LQGs universe in Indian country, unless OECA approves a deviation from this requirement. For example, deviations are given for states with small universes where it doesn't make sense for a Region to inspect 6 LQGs per year or 20% of the Region's LQG universe in Indian country. In the Comment Section, provide the number of federal facility LQG inspections.				
	5	**RCRA02.s**	Project by State the number of LQGs to be inspected by the State during the year. At least 20 percent of the LQG universe should be covered by combined federal and State inspections unless an alternative plan is approved under the RCRA CMS.	N	N	N	N
	5	**RCRA04**	Project by State and Indian country the number of financial assurance mechanisms to be reviewed by the Region during the year. Regions must commit to review financial test and/or corporate guarantee submissions for compliance with the closure and post-closure regulations at a number of facilities at least equal to the Region's commitment under RCRA01. As an alternative, Regions may choose to conduct formal financial record reviews for facilities that did not have a financial assurance review during the FY 2005-FY 2010 as part of the national enforcement initiative. The financial test/corporate guarantee compliance evaluations or financial record reviews may occur at the same facilities being inspected under RCRA01 or at different TSDFs.	N	N	N	N
	5	**OSRE-04**	For 100% of the financial test submissions received each fiscal year for corrective action with cost estimates over $5 million, determine whether the submission is in compliance. Where the submission is noncompliant, take appropriate enforcement action to address noncompliance (e.g., notice of violation). If possible, return facility to compliance by end of fiscal year.	N	N	N	N
	5	**TSC01**	Project the number of FY2012 TSCA inspections.	N	N	N	N
	5	**FIFRA-FED1**	Project regional (federal) FIFRA inspections, including those at federal facilities. Each Region should conduct a minimum of ten (10) FIFRA inspections. In the Comment Section, provide the number of federal facility inspections.	N	N	N	N
	5	**EPCRA 01**	Conduct at least 4 EPCRA 313 data quality inspections.	N	N	N	N
	5	**EPCRA 02**	Conduct at least 20 EPCRA 313 non-reporter inspections.	N	N	N	N
	5	**FED-FAC05**	Each Region must conduct ten (10) federal facilities inspections to support integrated strategy areas, which include stormwater; federal underground storage tanks, federal prisons; RCRA surface impoundments, RCRA corrective action sites, and vulnerable populations. These inspections can be achieved through any combination of single media or multimedia inspections with the following limitations: (1) a maximum of three UST inspections can count toward this goal and (2) a maximum of three (3) vulnerable community inspections can count toward this goal, and (3) for any multimedia inspection conducted, it shall count as two inspections toward this goal if two of the individual	N	N	N	N

			inspections support the *Integrated Strategies*. These inspections may simultaneously satisfy inspections commitments required in National Enforcement Initiative or other core program areas.				
	5	**SRF01**	Develop a schedule of state reviews for the four years of Round 3 (2012-2016), completing all remaining states from Round 2 in 2012. Included in this 2012 work are conducting for one state, an integrated permit and enforcement review process. Identify the number of Round 3 reviews to be conducted, consistent with SRF guidance in FY2012, by year and by state. Where appropriate, program improvements should be captured in appropriate negotiated PPAs, PPGs, or categorical grant agreements between the Region and the State, with accountability for carrying out those commitments. Information on SRF reviews, along with the recommendations, are to be entered into the SRF Tracker.	N	N	N	N

Accountability Measures for Enforcement and Compliance Assurance[1]

1. Environmental and/or public health benefits achieved through concluded enforcement activities, e.g., case settlements, injunctive relief, etc.

   Pilot measure: Volunteer states will be sought to participate with EPA in pilot test use of Case Conclusion Data Sheet or comparable approaches to analyzing benefits achieved from enforcement activities.

2. Rates of significant noncompliance for selected regulated populations.

   All states continue to provide facility-specific compliance information through automated data systems. Volunteer states will be sought to participate with EPA in development of statistically valid compliance rates.

3. Percentage of significant non-compliers (SNCs) that have been returned to compliance or otherwise addressed.

   All states continue to provide facility-specific compliance information through automated data systems.

4. Results of using State alternative compliance approaches (e.g., audit laws or policies, small business compliance policies, XL projects) and compliance assistance.

   Pilot measure: Volunteer states will be sought to provide EPA with data on evaluation of the results of compliance incentives and compliance assistance efforts. Provide narrative description of alternative compliance approaches.

5. Total number of inspections conducted at major facilities, and the percent of total universe of regulated sources inspected in negotiated priority areas (e.g., industry sectors, geographic areas).

   All states continue to report facility-specific data through automated data systems. Negotiate means for reporting information on inspections of facilities not covered by current data systems.

6. Enforcement actions (e.g., case referrals, orders, notices) taken, by media.

   All states continue to provide facility-specific compliance information through automated data systems.

---

[1] As stated in the 1997 *Joint Statement on Measuring Progress under NEPPS*, "Beyond core performance measures, there are other program output and fiscal reporting requirements we must use to document our various program activities." States are expected to continue reporting this routine program and fiscal tracking information. At the same time, States and EPA Regions are encouraged to work together to review the value and cost of these data exchanges and eliminate low-priority reporting.

7. Number of facilities/entities reached through each type of compliance assistance activity. *Pilot measure: Volunteer states will be sought to participate with EPA in pilot to provide data on compliance assistance activities. Describe any current reporting a pilot State does on compliance assistance activities.*

Enforcement and Compliance
Data Quality Strategy

March 25, 2002

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I. Introduction

The Enforcement and Compliance Data Quality Strategy's purpose is to develop and implement an ambitious, practical plan to assess and manage the quality of enforcement and compliance data. This work is critical for EPA's own business needs throughout OECA and the Regions, for programs in state and local governments, and for the public. A short but not exhaustive list of reasons the Agency invests in maintaining the integrity of enforcement and compliance data includes the following:

- High quality data in EPA's national databases is essential for credible measures, reports, and analyses.
- EPA managers and members of Congress rely on this data to hold EPA programs accountable and to inform their decision-making.
- Accurate data, in an accessible and usable form, is essential to support Agency planning and targeting.
- The Government Performance and Results Act (GPRA) requires federal agencies to develop program plans and performance measures, and to report on progress achieved each year. Documenting performance requires timely, high quality data.
- Accurate and complete information in EPA's enforcement and compliance databases ensures that states are properly credited for their enforcement and compliance monitoring activities.
- Proof of high quality gives rise to confidence among the public, industry, and other users of enforcement and compliance data, especially if the public is provided Internet access.
- Conclusions drawn in analyses and reports by OECA or outside groups using EPA data have been challenged based on concerns about data quality. In recent years, Inspector General reports have stressed the need for increased attention to data quality in Agency efforts to monitor and measure enforcement and compliance programs.

Relationship to Quality Management Plans

Although Region's have their own Quality Management Plans (QMP) to ensure data quality, this Enforcement and Compliance Data Quality Strategy covers areas not traditionally covered by Regional QMPs. This fiscal year, OC is also updating its Office-level Quality Management Plan (QMP), which is intended to clearly and fully document the policies, work processes, resources, management structure, and other critical elements of OC's data quality program. For more information on the relationship between this Data Quality Strategy and the OC QMP, please see Appendix 1.

II. Vision Statement

The vision of the Data Quality Strategy (DQS) for enforcement and compliance data is to assure that the data used to support enforcement program decisions are of high quality and accurately reflect the activity and accomplishments of OECA programs. High quality data is defined as accurate, complete, and timely data that are clearly presented and consistent with national data standards. OC believes that assessments of data quality will demonstrate and result in improved accuracy of enforcement and compliance. The Agency can confidently disseminate and use this information to evaluate programs, target resources and to inform Congress, the public, and the news media.

The DQS calls for all levels of OC and its partners to actively manage the quality of data in the national data systems to the highest possible standards by:

- assessing the quality of enforcement and compliance data in its data systems on an ongoing basis;
- identifying any missing, incorrect, or inadequate data; and
- responding to problems as they are identified thereby continually improving data that does not meet data system, program, Office or Agency standards.

The Strategy is designed to reshape *ad hoc* data quality efforts and to establish routine and systematic methods for improving and maintaining a high level of data quality. The focus of this strategy will be to identify data quality problems by examining enforcement and compliance data in Agency systems and raising issues to the appropriate personnel for further analysis and correction. When data quality problems are found to be due to the inherent structure of a database or to established data processing procedures, these issues will be raised both to the appropriate system managers and to the Integrated Compliance Information System (ICIS) modernization team, who can act on many of the recommended improvements in software/hardware specifications, as well as data entry, verification, and documentation.

The following principles will guide implementation of the strategy:

- **Research** into problems and analyses will focus on real data and its usage.
- Critical analyses will be **objective.** Analytical techniques that yield comprehensive assessments, such as random sampling of entire data systems, will be used rather than anecdotal investigations. Where practical, root cause analyses will be undertaken to identify systemic reasons for inadequate data quality, which will help formulate practical solutions.

- **Responsibilities** for finding solutions to data quality problems will be clear. Expectations for performance will be established.

- Implementation options to improve data quality will be **realistic** and feasible. In some cases, FY02 data quality assessments may examine a longer time period, but implementation options will be limited to remedying only the two most recent years of data.

III. Common Data Quality Issues

The data quality activities discussed in this Strategy are specifically aimed at identifying data that is missing, incorrect, or inadequate. Definitions of these terms are provided below.

Missing Data refer to required files, records or values that are not in the EPA national databases due to incomplete reporting by EPA Headquarters, EPA Region, a state agency, a local authority, or facility. This deficiency precludes accurate program evaluations and could suggest that important environmental work is not being done.

Incorrect Data are values within a field that do not accurately represent the true value. There are three main reasons for data in a required field to be incorrect. These reasons are data creation errors, data entry errors, and ambiguity in use of data fields.

Data Creation Errors: Programmatic staff can err while filling out forms that are forwarded to data entry staff or when entering data online. Some of these errors can be the result of ambiguity in guidance (see below), poorly designed data reporting tools, overlapping systems requiring a staffer to report the same data for entry into two or more systems, and lack of management emphasis on the importance of submitting complete, high quality data. Facilities may also generate errors in preparing required reporting (e.g., monthly discharge monitoring reports required by CWA permits).

Data Entry Errors: Mistakes may be made during data entry by data entry staff or, more rarely, by translator programs. Mistakes may also be due to a lack of data quality checks prior to data entry. For example, established procedures to verify the information on paper records (e.g., inspection reports, enforcement action reports, Case Conclusion Data Sheets) may be inadequate. Finally, there may not be sufficient training and tools provided to staff who enter data to ensure data are entered properly.

Ambiguity in Use of Data Fields: Misinterpretations and/or inadequate guidance concerning what data should be in required fields may result in inconsistency in values across Regions and states and others.

Inadequate Data are defined as records or fields that are not accessible or usable as currently maintained in EPA national databases. For example, data fields might exist in systems, but EPA does not require reporting or has allowed the fields to fall into disuse. Alternatively, new data needs may have arisen due to programmatic changes and the data systems were not modified to meet those needs. In other instances, inadequate data may result if regulations or policies have not been updated to match new goals, technologies, or systems.

IV. Data Quality Activities

This Data Quality Strategy proposes various activities to identify and correct current data quality problems. Annually, OC will develop an enforcement and compliance Data Quality Strategy Implementation Plan in consultation with Regions and states. The goal of the plan will be to identify specific data quality issues through periodic activities, such as audits and analyses. The outcome of these activities will be used to prioritize the order in which to address any data problems. Resulting analyses will be sent to Regions and states for review and correction where appropriate. Ongoing activities, such as the development of online correction, will be undertaken at the same time to address data quality problems that are long-term projects or may require activities on repeating schedules (e.g., training).

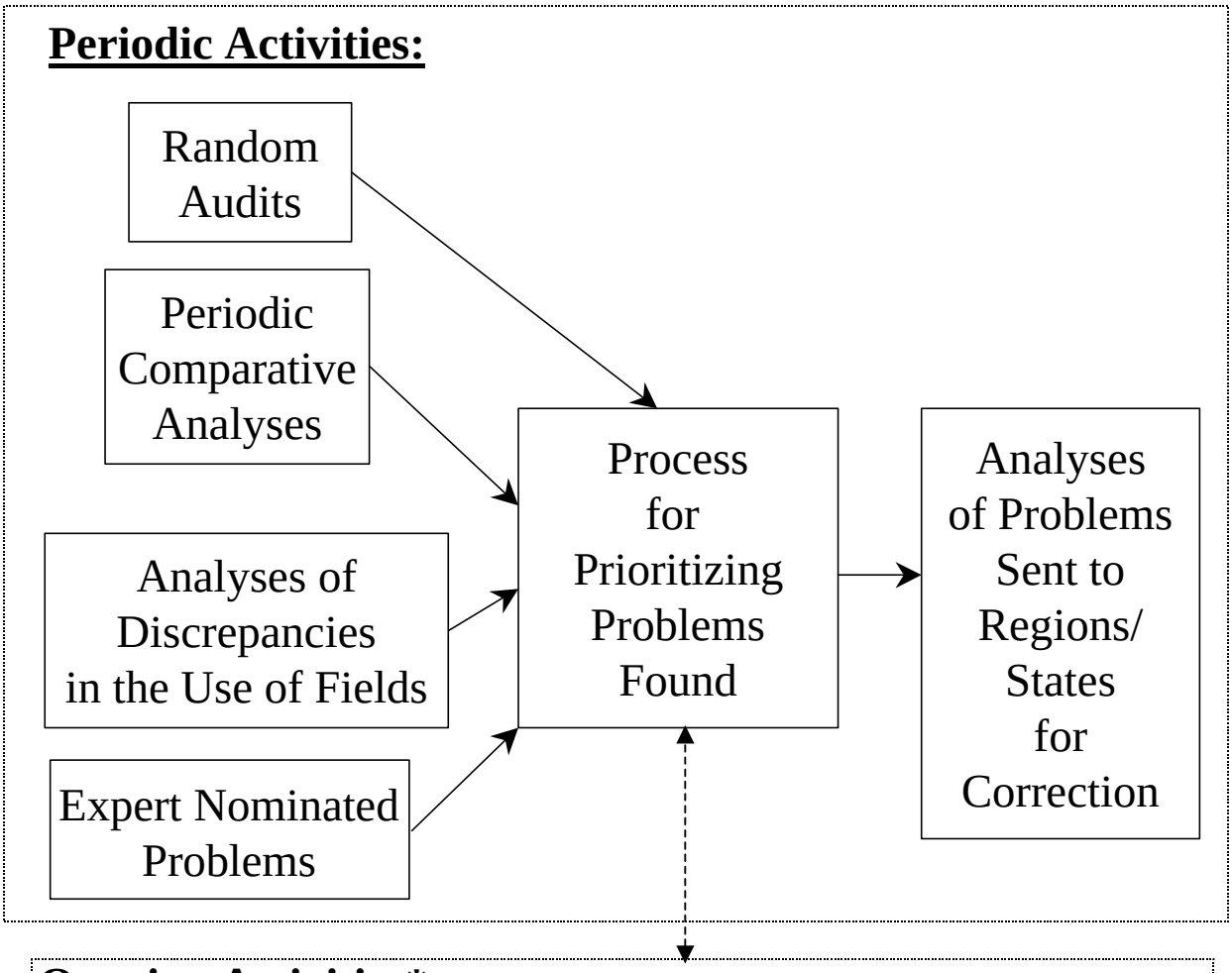
Proposed activities are organized and described in this section according to whether they are periodic or on-going. Figure 2 shows how the activities fit within the DQS and how they are expected to complement each other.

A. Periodic Activities

OC will develop an annual Data Quality Strategy Implementation Plan in consultation with the Regions and states. The plan will identify specific projects for the coming year. It will include relevant details and planning information for:

- identifying data errors;
- prioritizing problems found;
- selecting data quality projects and involving Regions and states; and
- sending analyses of problems to Regions and states for correction.

Figure 2: Activities Established by the Data Quality Strategy



Ongoing Activities*

- Internet error correction
- Developing, revising, and maintaining:
  - —training and tools for data entry clerks
  - —data entry and validation procedures
  - —policies and procedures to ensure the accuracy of the information on paper records
- Clarification of guidance on fields and new program guidance
- ICIS/Modernization efforts and changes to legacy systems

*Any of these ongoing activities may uncover problems that need to be addressed more formally. In addition, the solutions for some of the prioritized problems may result in revisions or new data entry procedures, clarification of guidance, or system changes/modernization.

Identifying Data Errors

Data problems will be identified through methods such as: random data audits; comparative analyses; analyses of discrepancies in the use of fields; and expert nominated problems. Each of these is described below.

- Random Data Audits. Data in selected key data fields will be independently evaluated through random data audits to validate its accuracy and completeness.

- Periodic Comparative Analyses. Periodically, comparative analyses of particular data fields across organizational units with delegated authority will be conducted to identify potential data quality problems. For example, comparing Significant Non-Compliance or inspection rates within Regions or states to the national average can be used to identify extreme outlying values that might indicate data problems.

- Analyses of Discrepancies in the Use of Fields. OC will analyze key enforcement and compliance activity data fields to determine if there are discrepancies in Regional or state usage. Discrepancies found will be documented, and guidance developed to assist program implementers and database users in how to use the codes for nationally consistent reporting.

- Expert Nominated Problems. Staff with significant experience and expertise with individual data systems (data system staff, program staff or expert users) will identify any quality issues they encounter. It is expected that such data quality problems will be identified from intensive usage, such as targeting and measures analyses. In addition, data problems found by comparing data required to be entered into more than one database can be used to reconcile information across data systems.

Prioritizing Data Problems Found

Once data problems are identified, they will be prioritized by a standing data quality workgroup that will consult with relevant stakeholders. Data quality efforts will focus on:

- data in the legacy database that will next be modernized;
- administrative priorities of stakeholder agencies and offices involved in management of each data system;
- EPA administration priorities;
- areas of concern raised by the Environmental Council of the States (ECOS), the Inspector General, EPA Management, Regional information users and managers;
- areas of concern discovered by methodologies for identifying data problems (see Figure 2, ‘Periodic Activities’);
- areas of concern raised by public access; and
- Regional and state review of assessments that confirm validity of the problems.

Selecting Data Quality Projects and Involving the Regions and States

Development of the annual Data Quality Strategy Implementation Plan will follow a structured decision making process. This process will resemble the one used for development of the FY02 Implementation Plan (Appendix 2) and is described below. Each year, OECA's MOA Guidance will specify the number of national data quality projects for EPA and states to work on during each year.

The process will start with an annual Data Quality Strategy workshop held in the spring. Participants will include staff from headquarters, Regions and state representatives. Workshop participants will:

- discuss issues related to the identification and implementation of the current year's projects; and

- brainstorm ideas for the next year's projects.

Sub-workgroups will be convened to build upon the discussions from the Data Quality Strategy workshop and to flesh out the projects to be recommended for implementation as well as methods for analyzing them. During the summer, the sub-workgroups will make their recommendations, which will then be sent to the entire Data Quality Strategy workgroup for review and comment.

The detailed implementation plan for the upcoming year will then be drafted and distributed to a wider set of stakeholders. This implementation strategy will be distributed for review and comment to the entire data steward community, including ECOS, before being finalized. Information on planning, assignment of responsibilities, progress, and results will be coordinated with Regions and states, via the Regions. State and Regions will have scheduled opportunities to communicate their comments on the projects to Headquarters.

Sending Analyses of Problems to Regions and States for Correction

Once the data quality problems are identified via Periodic Comparative Analyses, Analyses of Discrepancies in the Use of Fields, and Expert Nominated Problems and assessments are complete, and problems are researched and well documented, Regions and states will be informed of the problems through distribution of analysis reports in various formats (e.g., short DQ alerts, longer memoranda). These reports will describe in detail an identified data quality problem narratively, and, where applicable, graphically and quantitatively. They will be written for the selected problems and sent to the responsible Regions, states (via the Regions), and Headquarters personnel to alert them of potential data problem so they can correct the data already in the system and make any other changes needed to avoid the problems in the future.

B. Ongoing Activities

The following activities will be undertaken on an ongoing basis to uncover, prioritize and address data quality problems:

- Internet error correction;
- promoting accuracy of initial reporting, paper records, data entry, and validation procedures;
- updating a variety of guidance documents for activities that affect data quality; and
- updating data system documentation and support system modernization and ICIS development.

Many of these activities will be influenced by and will influence the periodic activities described in the previous section (see Figure 2). For example, data errors identified through periodic audits and analyses may spur changes to ongoing data quality work (e.g., revisions to data entry procedures, clarification of guidance, or system changes/modernization). In turn, the ongoing data quality activities will directly impact the types and number of data quality concerns.

Internet Error Correction

Currently available Internet error correction tools will be applied to particular records in need of correction. For example, OC will use information from the Headquarters, Regional, and state data steward networks, as well as the (Online Tracking Information System) OTIS site (and the Public Access Internet site when it becomes available) and its error correction process to pin-point data records within OC's national databases in need of correction. The Office of Environmental Information (OEI) is expected to improve the online system for informing data stewards at the Regional and state level about potential problems with individual records reported by data system users. OEI's system will also track the performance of Regional and state data stewards responsible for making corrections. Resources and encouragement from program management will be critical to ensure the continued and effective involvement of those data stewards responsible for responding to error correction requests.

Promoting Accuracy of Reports, Paper Records, and Data Entry and Validation Procedures

Regions and states are expected to commit resources to enter required data into EPA's national databases in a timely and accurate manner. The following are examples of activities OC may undertake, or encourage the Regions and states to undertake, to ensure that data quality procedures are accurately documented and followed.

- Utilize and document existing edit and validation checks in the legacy databases, and make recommendations for new edit and validation checks to be incorporated into ICIS as the databases are modernized. As part of OC's Quality Management Plan (discussed in the Appendix 1), Data System Quality Assurance Plans will be developed for the each of

the data systems for which OC has primary responsibility. The Data System Quality Assurance Plans will describe the existing and planned editing checks and validation procedures that are part of each data systems.

- Develop new policies and procedures to minimize data errors stemming from the filling in of field reports and paper records (e.g., inspection reports, enforcement action reports, case conclusion data sheets). Distribute these procedures to the staff responsible for entry. This may include procedures for tracking documents and standardizing document storage. Some examples of existing database policies and procedures for minimizing data errors prior to data entry are listed in Appendix 6.

- Provide training for all staff generating and entering data that ultimately resides in EPA's data systems. Policies and procedures may need to be reviewed for delegated programs directly entering data into EPA's national databases as well as for states using translator programs.

- Where the training of data entry personnel is adequate, review the rejected transactions for a specific period of time. In some cases, the data problems may be due to a "process" rather than data entry errors. For instance, duplicate discharge monitoring reports (DMRs) for the NPDES program may be continuously routed for data entry, causing numerous "record on file" rejects.

- Inform Regional and national program management of the need for sufficient resources to support the implementation of more comprehensive and accurate data entry and verification procedures. Please refer to Appendix 6 for examples of existing policies and procedures for minimizing data errors. For example, disinvestment in accurate, complete data entry and correction for NPDES minors in the Permit Compliance System has eroded the quality of enforcement and compliance data for this universe of over 87,800 facilities.

- Conduct a one-time review of instructions for data submission to ensure that Regions and states provide data in formats consistent with data system requirements (e.g., values and/or formats should be consistent with data system or translatable with full documentation).

Updating Data System Guidance

Data system guidance and documentation will be updated to address discrepancies in the use of key enforcement and compliance activity database fields. Fields that are inconsistently used by Regions and states could stem from different understandings of how database fields are to be used, or from outdated media-specific program guidance.

System Updates and ICIS/Modernization

OC will work to maintain current, well documented system data dictionaries for those systems run by OC. Such efforts to create and maintain all required documentation will be explicitly called for as part of OC's Quality Management Plan. These data dictionaries should provide clear definitions of data fields and, when necessary, clear definitions of programmatic terms, such as, what a "final judicial order" means for the RCRA program.

OC will also work with the modernization team to ensure that the data quality improvements recommended by the Data Quality Strategy are built into the modernized data systems.

V. Regional and State Implementation of the Strategy

Since Regions and states are responsible for entry of enforcement and compliance information, their active participation in data quality efforts is critical. OECA's Memorandum of Agreement Guidance will continue to specify the Region's level of commitment to implementing the DQS.

OC will propose the following efforts to ensure Regions and states implement the activities of this Data Quality Strategy:

- Provide yearly quality assurance awards to states.
- Do not give credit for program actions and results that are not entered in a national database. Notify programs, Regions and state staff and management of this policy.
- Make any OECA discretionary extramural funding given to states dependent on whether the state commits to and prioritizes maintaining quality data. Maintaining quality data includes providing the data in a form consistent with EPA data system requirements and codes.

Coordinating with Other Key Activities

The proposed data quality planning, implementation, and assessments will be coordinated with other activities to further encourage state and Regional participation in data quality efforts. These activities are listed below.

- Highlight data quality issues in the Regional profiles that are provided to senior management.
- Expand program status review reports to include additional data quality information.

- Publish data quality statistics for Regions to promote positive peer pressure.
- Communicate findings related to database design issues that affect data quality to the ICIS team.
- Raise data quality issues through the Enforcement and Compliance Performance Board.
- Provide annual expectations for data quality goals and/or participation in data quality activities in MOAs.
- Emphasize data quality in National Environmental Performance Partnerships (NEPPS) and grant guidances.

VI. Conclusion

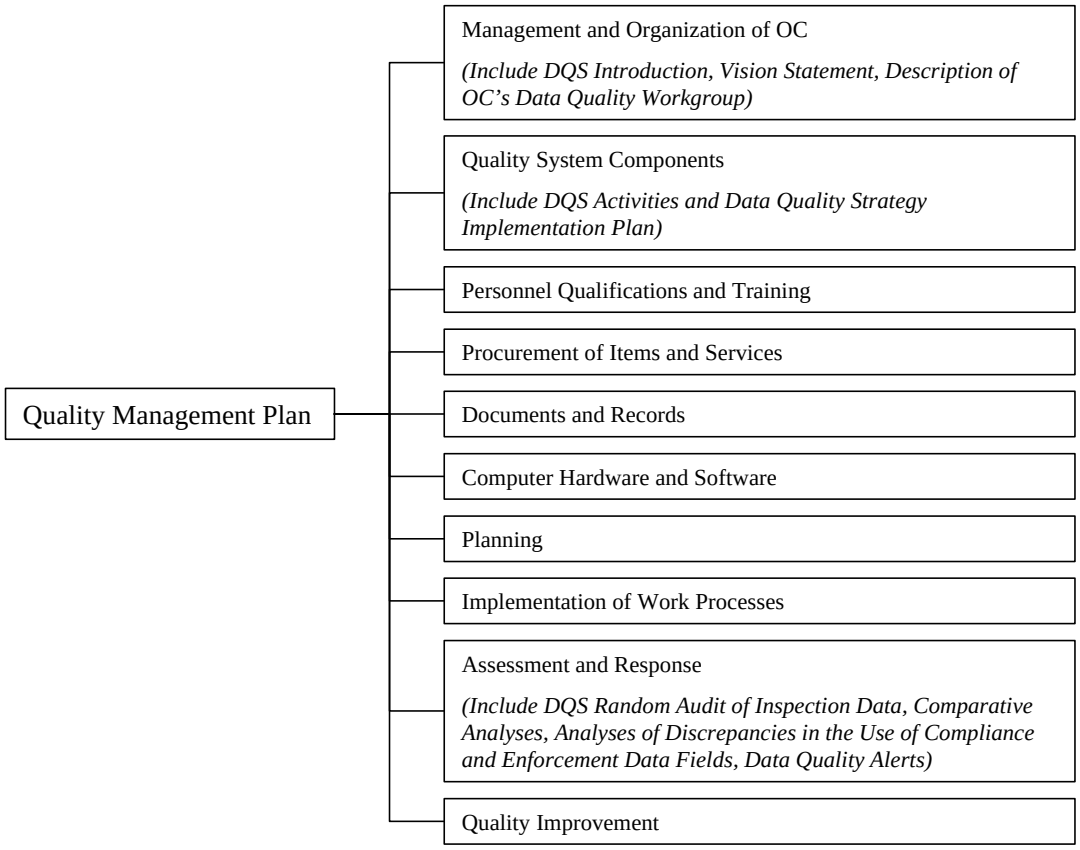
In FY2001, the Office of Compliance began developing this Data Quality Strategy (DQS) for assessing and actively managing the quality of enforcement and compliance information. The DQS sets forth the National Enforcement and Compliance Program's vision for assuring that the data used to support enforcement program decisions are sound and accurately reflect the activities and accomplishments of the program. The DQS also calls for a variety of data quality assessments of EPA data systems which will be undertaken in FY2002 and subsequent years.

Appendix 1

The Data Quality Strategy and the Office of Compliance Quality Management Plan

The updated OC Office-level Quality Management Plan (QMP) will detail how components of the DQS, such as data quality assessments, will inform ongoing planning and implementation of data quality activities and data system management. Figure 1 shows an outline of the major sections in OC's Quality Management Plan and how portions of the Strategy will fit within it.

Figure 1: How the Data Quality Strategy Fits Within OC's Quality Management Plan



Appendix 2

Process for Developing the Enforcement and Compliance Data Quality Strategy and the FY02 Data Quality Strategy Implementation Plan

On May 21, 2001 a call memorandum was sent from Michael Stahl asking for workgroup members to develop a Data Quality Strategy for Enforcement and Compliance Data. Representatives from the media program offices and staff who work directly with EPA maintained enforcement and compliance national databases (DOCKET, AFS, PCS, RCRAInfo, FTTS, and SDWIS) signed up for the workgroup as well as Headquarter personnel (particularly those involved with measures, targeting, and data system management).

On June 20, 2001, a Data Quality Strategy workshop was held in Washington. This served as the first workgroup meeting. There were presentations at the workshop on:

- an overview document providing a vision statement, definitions, and an initial outline of the Data Quality Strategy,
- methodologies for identifying, validating, and correcting of data problems and Errors;
- data errors on the front end; and
- documentation, guidance, and modernization – their impact on data quality.

In addition, we had brainstorming sessions in the afternoon. Discussions included:

- various options for conducting the identification and correction of errors;
- coming up with a list of problems we know about in terms of data entry;
- coming up with a list of policies and procedures for entering data; and
- coming of with lists of database fields needing clarification.

On June 28, 2001 summaries of the three breakout sessions were sent to the entire Data Quality Strategy workgroup. On July 6, 2001, the next version of the vision statement, definitions, and outline of the Data Quality Strategy was sent to the workgroup for comment along with documents which grouped the information from the three June 20 workshop breakout sessions

into categories and tasks. We asked workgroup members to get back to us with comments on these documents and the tasks they preferred to work on.

From these responses two sub-workgroups were created:

> 1) Tasks on Methodologies for Identification of Data Problems and Correcting Errors (led by David Sprague)
>
> 2) Tasks on Potential Fields Needing Clarification: Know Areas where Potential Misuse or Inconsistent Use is Occurring (led by Lynn Vendinello)

We also sent a list of overall, cross-cutting tasks for which we requested input from as many as people as possible.

We did not initiate a sub-workgroup on Data Quality on the Front End. We asked the data system managers to provide us with write-ups describing what data entry and validation checks are already programmed into our national databases. On June 18, 2001, we requested the Data Quality Strategy workgroup members provide us with information on policies and procedures their Regions and states have to ensure the accuracy of the information on the paper records (e.g., inspection reports, enforcement action reports, case conclusion data sheets) **before** they are transmitted to data entry staff. We also requested information on what training and tools are provided to staff who enter data to ensure the data will be entered accurately.

The number of data quality projects which are being recommended for FY02 were decided upon by the data quality and targeting teams of the Information Utilization & Targeting Branch (IUTB), and OC management consensus. The sub-workgroups and the data quality and targeting teams of IUTB recommended projects. Appendix 3 provides an overview of the data quality projects planned for implementation in FY02. Appendix 4 describes the projects in more detail and presents a schedule for implementation. Appendix 5 presents a schedule for FY03 projects. The Potential Fields Needing Clarification sub-workgroup helped decide which fields will be analyzed and how the analyses will be done. The Identification of Data Problems and Correcting Errors sub-workgroup helped develop the Random Audit of Inspection Data project as well as the Comparative Analyses charts. The decisions made by these sub-workgroups were made with consultation from the data quality and targeting teams of the Information Utilization & Targeting Branch (IUTB). In addition, the targeting team of IUTB nominated two data quality alerts to be sent to the user communities early in 2002.

The next step in the review process was to send the recommended data quality projects and analyses to the entire Data Quality Strategy workgroup for review and comment. For example, the entire Data Quality Strategy workgroup were sent:

1) the proposals for how to analyze the four codes needing clarification,
2) the proposed methodology for conducting the random audit of inspection data,

3) sample periodic comparative analyses charts,
4) two data quality alerts proposed by the targeting team of IUTB.

Since the Data Quality Strategy workgroup is composed of headquarters and Regional database and program representatives, as well as one state representative, their input was essential.

Once the comments by the Data Quality Strategy workgroup were received, the FY02 Data Quality Implementation Plan was completed. This plan provides detailed outlines of all the data quality projects which will be conducted in 2002. Before finalizing the plan, the Implementation Plan was sent to all the affected user communities, including ECOS, for their review and input.

Appendix 3

Overview Chart of the FY02 Data Quality Strategy Implementation Plan

DQ Activity	Random Audits	Comparative Analyses	Fields Clarifications	Data Quality Alerts
Level of Activity	One per year	Analyses of 4 indicators, three media projects issued semi-annually	New fields are to be analyzed each year	2 issued annually
Current Proposed Project	Inspection Fields of AFS, PCS, and RCRAInfo	Inspection Coverage, formal enforcement actions, penalties and SNC data in AFS, PCS, and RCRAInfo	PCS Enforcement Action Codes 4 RCRA fields	One Air; One RCRA
Correction/ Identification Method Proposed	Select permits/facility ID's randomly. Post inspection data from national data systems for those ID's on website.	State level values compared against national averages	Investigate current usage of data fields and bring findings back to workgroup	Discoveries currently being brought to workgroup attention.
Regional Involvement	Compare paper records to posted data on website. States/Regions can indicate discrepancies online.	Follow-up with states that show low outlier values (e.g., less than half the national ave.).	Workgroup established to develop responses for each field needing clarification.	Clean up data as indicated
State Involvement	Compare paper records to posted data on WEB site. Indicate corrections	States with low outlier values will have to certify validity of data or explain problem.	Workgroup established to develop responses for each field needing clarification.	Clean up data as indicated

Appendix 4

Description and Schedule for Implementing FY02 Projects

The following Appendix describes the projects that OC plans to implement during FY02. An implementation schedule for FY02 projects is presented at the end of this appendix. For further information on any of these projects, please contact David Sprague (sprague.david@epa.gov).

A. Random Audits

Objective: To quantify the accuracy and completeness of selected fields as maintained in the federal data systems.

Example of the type of statements that will be supported by the audit results: "The inspection information maintained by EPA is 95% accurate. Based on the survey methodology used, we are 95% confident that this error rate is within 3% of the true value."

- This year's audit will examine inspection data only.

- The audit will focus separately on populations within each of the three media databases:
  - ✓ Facilities subject to CAA programs as defined by the RECAP universe = 42,075
  - ✓ Facilities with active, major water permits = 6,670
  - ✓ Facilities defined as TSDs and LQGs in RCRAInfo = 23,046

- An audit of 8 facilities per program and state is designed to minimize respondent burden for the Regions and states and will yield statistically valid results with which to characterize accuracy of inspection information in the national data systems.

- Reviewing this number of facilities should provide a large enough sample size to have 95% confidence in the results, with an error rate of +/- 3%.

Random Audits: Comments and Responses

The following comments were made by states and Regional staff on earlier drafts of the audit methodology:

- **Comment:** The universe of facilities sampled should include more facilities from larger states and less from smaller states.
  Response: In developing the random audit, OC was sensitive to not overburdening individual states. The sample size of eight is based on the number of permit IDs necessary from the largest states (in terms of federally reportable inspections) to obtain results that allow EPA to be 95 % confident that the results are within a reasonably small confidence interval. The sample size of eight does lead to over sampling from smaller

states. This over sampling of some states should provide a cushion by helping to address the possibility that some states will not fully participate. Statistical weighting of the audit results will adjust for over sampling in some smaller states.

- **Comment:** States should be able to check the hard copy data against their state/local data system at the same time they check the data on the proposed Data Quality Website.
  Response: Others in the workgroup believe that it is not always the same person who would check the hard copy and the state/local data systems. To reduce confusion and workload, OC feels that it is appropriate to keep the focus of the random audit on checking discrepancies in the federal data systems. A follow-up request to check state/local data system will be made only if discrepancies are found.

- **Comment:** States will need notification regarding this effort during the once a year EPA/state MOA or PPG negotiations.
  Response: This is a relatively small effort and is directly related to compliance with the Data Quality Strategy. As such, it should be considered as included in the previously negotiated MOAs. In developing the random audit, EPA was sensitive to not overburdening individual states. In any given state program, checking eight records is not expected to be a significant burden.

B. Comparative Analyses

Objective: To identify potential data quality problems (outliers) by comparing state-level statistics to an established benchmark (i.e., ½ national average).

The following activities are proposed for FY02:

- Comparative analyses charts for RCRA, CWA, and CAA which show all the states sorted by percentages and will include:
  - ✓ Inspection coverage
  - ✓ Ratio of formal enforcement actions to number of facilities inspected
  - ✓ Ratio of HPV/SNC facilities per facilities in violation

- The Regions overseeing states that fall below a performance threshold (i.e., one-half the national average) would be sent a memorandum asking them to
  - ✓ discuss the findings of the comparative analyses;
  - ✓ certify data is accurate; and
  - ✓ determine cause for missing data.

- Comparative Analyses: Comments and Responses

Comments by members of the Workgroup included:

- **Comment:** For air, comparative charts of enforcement actions/total # facilities and HPVs/total # facilities make more sense than having # of inspections and # violations as the denominators.
  Response: Using the number of inspections in the denominator is an appropriate measure of data quality, rather than using the number of facilities. This approach to the data quality assessment of actions takes into account two factors that are expected to be related to the reported number of actions: 1) the number of facilities and 2) the number of inspections (the amount of effort put forth by the program). The same logic applies to the SNC analysis. That is, disregarding the level of effort put forth by the program will change the results and highlight states that do not have many facilities in violation.

- **Comment:** It would be good to coordinate these analyses with the annual audits Regions conduct of states regarding specific facilities.
  Response: The Regions are encouraged, as much as possible, to coordinate the concerns raised by these analyses with their audits of their States.

C. Fields Clarification

Objective: Identify discrepancies in the use of key enforcement and compliance data fields.

- RCRA Fields Clarification: The workgroup of Regional and Headquarters members have participated in a series of conference calls to identify the appropriate use and definition of informal vs formal action codes, and the applicability of corrective action codes as they pertain to the enforcement program. The group has received input from the RCRA and Corrective Action enforcement program offices indicating the appropriate use of existing codes to address enforcement and/or corrective action remediation. A guidance package is being developed and will include specific scenarios to assist program implementers in determining how to use the codes for nationally consistent reporting. Completion of the draft guidance package is expected by mid-March, 2002.

- Four RCRAInfo codes were examined:
  - ✓ RCRA New Violation or Roll-Over of Existing Violations,
  - ✓ Appropriate Entry of Formal and Informal Actions,
  - ✓ RCRA 500 vs. 600 Series,
  - ✓ Corrective Action Codes in the Enforcement Module.

- In addition, a DQ sub-workgroup identified one PCS code for study:
  - ✓ Compliance Schedule Event Codes

Fields Clarification: Schedule

- Donna Inman is working on the necessary guidance and clean-up related to the 4 RCRA codes studied.

- The PCS Enforcement Action Clean-up guidance will be distributed in final soon.

- A workgroup has not begun yet to work on clean-up of the compliance event schedule codes in PCS.

D. Data Quality Alerts

Objective: Address data quality problems identified by data users (e.g. targeting, measures, and Regional analysis)

- Two Data Quality alerts have been chosen:
  - ✓ HPV facilities being entered into AFS without any underlying violations being entered into the system.
  - ✓ Regions and States failing to close out violations in RCRAinfo

- Two more data quality alerts will be written and distributed later in the year

Data Quality Alerts: Comments and Responses

- **Comment:** Some reviewers misunderstand the concept of a Data Quality Alert.
  Response: Language will be added to the Data Quality Alerts describing their purpose and what responses are expected from the Regions and States.

- **Comment:** Manual updating of the HPV flag is no longer necessary. The excerpt from Appendix A of the T&A HPV Workbook does not reflect this.
  Response: Clarifying language will be added to the CAA data quality alert to respond to these concerns.

- **Comment:** Facilities could have come into compliance more than 2 years ago but still have HPV status since not all penalties have been paid yet. This effort may prove to be a lot of work with little return if the data is found to be valid for many facilities.
  Response: Clarifying language will be added to the CAA data quality alert to respond to these concerns.

Appendix 4: Schedule for FY02 DQ Strategy Implementation Projects (Page 1 of 2)

♦ = Will happen within specified week
|—| = Will happen over specified weeks
- - - = Will happen sometime during specified time period

Week of:	2/18	2/25	3/4	3/11	3/18	3/25	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30
Data review prior to public access announced					♦																												
Data review for public access site						|									|																	
Release of public access site																- - -	- - -	- - -	- - -														
FY02 Audit instructions sent out						♦																											
State and Regional audit of sampled inspection records						|																										
Distribute, and Regional/State review of FY02 Audit preliminary results											|			|																		
Comments on FY02 Audit prelim results due													♦																				
Distribute FY02 Audit final results														♦																			
Clean-up of RCRA fields	|									|																						

Appendix 4: Schedule for FY02 DQ Strategy Implementation Projects (Page 2 of 2)

Week of:	2/18	2/25	3/4	3/11	3/18	3/25	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30
Distribute, and Regional/State review of 1st Comparative Analysis & "HPVs in AFS" DQ Alert											|	—	—	—	—	—	—	—	—	—	—	—	|										
Responses due from "HPV DQ Alert"																				♦													
Responses due from 1st Comparative Analyses																							♦										
Undertake 2nd FY02 Comparative Analysis																											|	—	—	|			
Distribute, and Regional/State review of 2nd FY02 Comparative Analysis																														|	—	—	|
Distribute, and Regional/State review of "Closing out violations in RCRAInfo" DQ Alert																									|	—	—	—	—	—	—	—	|
Responses due from "Closing out violations in RCRAInfo" DQ Alert																																	♦

♦ = Will happen within specified week
|— | = Will happen over specified weeks
- - - = Will happen sometime during specified time period

Appendix 5

Schedule for Implementing FY03 DQ Strategy Projects (Page 1 of 2)

♦ = Will happen within specified month
|—— | = Will happen over specified months
- - - = Will happen sometime during specified time period

Month of:	4/02	5/02	6/02	7/02	8/02	9/02	10/02	11/02	12/02	1/03	2/03
Workshops to identify FY03 Data Quality Projects	♦										
Sub-workgroups meet /plan work for FY03 projects		|———————|									
Put language in MOAs regarding Regions implementing/overseeing FY03 DQ projects		♦									
Undertake and distribute for review two Misuse of Fields & Comparative Analyses			|———————|								
Comments due on Misuse of Fields & Comparative Analyses				♦							
Distribute draft of FY03 Implementation Plan for to DQ workgroup for review				|———————————————————|						
Comments on FY03 Implementation Plan due							♦				
Incorporate comments on FY03 projects							♦				

Schedule for Implementing FY03 DQ Strategy Projects (Page 2 of 2)

Month of:	4/02	5/02	6/02	7/02	8/02	9/02	10/02	11/02	12/02	1/03	2/03
Initiate workgroups to conduct data fields clean-up and guidance efforts								♦			
Undertake FY03 Audit								|———————————|			
Distribute for review FY03 Audit preliminary results										|———————|	
Distribute FY03 Audit final results											♦
Undertake and distribute for review FY03 Periodic Comparative Analyses & DQ Alerts								|———————|			
Distribute FY03 Audit final results									♦		

♦ = Will happen within specified month
|—— | = Will happen over specified months
- - - = Will happen sometime during specified time period

Appendix 6

Examples of Existing Policies and Procedures for Minimizing Data Errors Prior to Data Entry for Our Legacy Data Bases

A few examples of policies and procedures used by Regions and States to minimize data errors during entry into legacy data systems and to ensure the accuracy of information are presented below.

A. Region 3

PCS

Upon return from performing an inspection, the inspector/technical staff member is responsible for completing a regional **inspection form.** The form was created by the PCS Coordinator to collect inspection data and contains fields for collecting permit type information for those facilities that do not have an NPDES permit and are categorized as unpermitted, general, stormwater, etc., making it necessary to create a record in PCS before the inspection can be entered. The form provides a list of all inspection types, inspectors, facility types, and their associated codes. It's purpose is to provide quick and easy access to the information and required fields to enter inspections into PCS. (The inspection form 3560-3 has not yet been updated to include all of the new inspection type codes).

Once inspections have been entered into PCS, the weekly audit reports are checked to ensure acceptance of the inspection. If an inspection was rejected, the problem is resolved and the inspections are re-entered. A retrieval is also pulled to compare the inspections listed in PCS against the inspections sheets that have been collected for the month. For quick checks, an on line verification is used.

A similar process has been set up to collect **enforcement action data** using a created Enforcement Action (EA) Summary Sheet for PCS which list only those enforcement actions used by Region 3 and it's States. The sheet is comprised of enforcement actions and compliance schedules by name and code, it provides the name of the initiator, the date completed, permit number, action date, issued by, docket number, whether it's permitted or unpermitted, associated NPDES number and name, space to list any EA related compliance scheduled events, reason for the EA, and provides Close Out information. This form has been in existence for the past 15 years. It places all necessary information relating to the EA at your finger tips.

To QA enforcement action data in PCS, active enforcement actions and any associated compliance schedules are pulled and circulated among the technical staff. The staff review and update the EA status (e.g., amendments and close outs). This process is performed quarterly.

The Region has shared these procedures and tools with their States. The States of Maryland, Pennsylvania and West Virginia have similar procedures in place for the QA/QC of their data.

B. Region 6

In the RCRA program, after the State and EPA staff return from their inspections, they write up their inspection reports. All of Region 6's state and regional staff have peer review meetings in their Agencies to discuss potential violations. Besides other inspectors/enforcement officers, the Region also invites a lawyer to attend the meetings. Enforcement actions are written and case conclusion data sheets are completed (for EPA only) and attached to the enforcement action before the record is put into concurrence.

The States data (inspection/violation/enforcement) is usually reviewed by a supervisor before it is given to data entry personnel. Each one of the five States operates differently. The States have been informed for many years that they must have all inspection and enforcement actions in the data system at the time that reports are pulled for their mid-year and end-of-reviews. When discrepancies are discovered on the data reports, State personnel are called to resolve them. At the Regional office, all data information pertaining to inspections, violations and enforcement actions are reviewed in the Hazardous Waste Enforcement Branch by a program person who is the liaison with the Regional RCRAInfo group, located in the Information Management Section.

State data entry clerks receive Regional and National training once a year. In addition, they call Region 6's data personnel if they need any help. The Region pulls an Orphan/QA report for States and EPA data once a month. This report denotes data entries that are not properly linked. Also, the Region’s data group has developed other reports that they run regularly to check the Region's data.

C. Region 7

CAA

Region 7 does not have any established policy to ensure accuracy of data as it relates to the Air Program. Data entry into the Air Facility Subsystem (AFS) is paper-driven meaning a form is completed by the inspector or case review officer and given to the data entry person to enter the data into AFS. The region performs a cursory review of the data from time to time, but there are no policies in place to correct any data discrepancies.

Docket

When an administrative case has been filed with the Regional Hearing Clerk(RHC)/Docket Analyst, the attorney assigned to the case, completes a Case Initiation Data Sheet (CIDS) and hands this form to the RHC/Docket Analyst, who then enters this initial information into Docket. Upon the conclusion of the case, the staff attorney completes the Case Conclusion Data Sheet (CCDS) which is then given to an attorney for review. After the review process, the form is given to the RHC/Docket Analyst for her to enter the information into Docket. The data contained in Docket is frequently reviewed by the Deputy Regional Counsel. Also if the Docket Manager at Headquarters notices any data discrepancies, he immediately notifies the RHC/Docket Analyst of any mis-information who in turn corrects any data discrepancies. Monthly conference calls and annual meetings are also held.

RCRA

RCRA Information is entered based on what the compliance officers provide. A mechanism used to ensure data quality is RCRA fact sheets. RCRA fact sheets include lists of data elements that the user is supposed to enter into the system, as well as explanations of how the database is structured and how to assure proper data entry. Also, much of the input into the RCRAInfo database is based on letters, notification/inspection forms and telephone conversation records received. The originator of the information is contacted concerning any questions the data analyst may have. RCRAInfo training has been provided to the states. RCRAInfo conference calls are attended monthly along with annual RCRAInfo training.

D. Region 9

Region 9 has built a Lotus Notes system for reporting enforcement data to the DOCKET Coordinator. By eliminating paper forms, and by programming edit checks, help prompts etc. data quality has been significantly enhanced for the most recent two year period in comparison to historical trends.

Enforcement and Compliance
Data Quality Strategy

March 25, 2002

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I. Introduction

The Enforcement and Compliance Data Quality Strategy's purpose is to develop and implement an ambitious, practical plan to assess and manage the quality of enforcement and compliance data. This work is critical for EPA's own business needs throughout OECA and the Regions, for programs in state and local governments, and for the public. A short but not exhaustive list of reasons the Agency invests in maintaining the integrity of enforcement and compliance data includes the following:

- High quality data in EPA's national databases is essential for credible measures, reports, and analyses.
- EPA managers and members of Congress rely on this data to hold EPA programs accountable and to inform their decision-making.
- Accurate data, in an accessible and usable form, is essential to support Agency planning and targeting.
- The Government Performance and Results Act (GPRA) requires federal agencies to develop program plans and performance measures, and to report on progress achieved each year. Documenting performance requires timely, high quality data.
- Accurate and complete information in EPA's enforcement and compliance databases ensures that states are properly credited for their enforcement and compliance monitoring activities.
- Proof of high quality gives rise to confidence among the public, industry, and other users of enforcement and compliance data, especially if the public is provided Internet access.
- Conclusions drawn in analyses and reports by OECA or outside groups using EPA data have been challenged based on concerns about data quality. In recent years, Inspector General reports have stressed the need for increased attention to data quality in Agency efforts to monitor and measure enforcement and compliance programs.

Relationship to Quality Management Plans

Although Region's have their own Quality Management Plans (QMP) to ensure data quality, this Enforcement and Compliance Data Quality Strategy covers areas not traditionally covered by Regional QMPs. This fiscal year, OC is also updating its Office-level Quality Management Plan (QMP), which is intended to clearly and fully document the policies, work processes, resources, management structure, and other critical elements of OC's data quality program. For more information on the relationship between this Data Quality Strategy and the OC QMP, please see Appendix 1.

II. Vision Statement

The vision of the Data Quality Strategy (DQS) for enforcement and compliance data is to assure that the data used to support enforcement program decisions are of high quality and accurately reflect the activity and accomplishments of OECA programs. High quality data is defined as accurate, complete, and timely data that are clearly presented and consistent with national data standards. OC believes that assessments of data quality will demonstrate and result in improved accuracy of enforcement and compliance. The Agency can confidently disseminate and use this information to evaluate programs, target resources and to inform Congress, the public, and the news media.

The DQS calls for all levels of OC and its partners to actively manage the quality of data in the national data systems to the highest possible standards by:

- assessing the quality of enforcement and compliance data in its data systems on an ongoing basis;
- identifying any missing, incorrect, or inadequate data; and
- responding to problems as they are identified thereby continually improving data that does not meet data system, program, Office or Agency standards.

The Strategy is designed to reshape *ad hoc* data quality efforts and to establish routine and systematic methods for improving and maintaining a high level of data quality. The focus of this strategy will be to identify data quality problems by examining enforcement and compliance data in Agency systems and raising issues to the appropriate personnel for further analysis and correction. When data quality problems are found to be due to the inherent structure of a database or to established data processing procedures, these issues will be raised both to the appropriate system managers and to the Integrated Compliance Information System (ICIS) modernization team, who can act on many of the recommended improvements in software/hardware specifications, as well as data entry, verification, and documentation.

The following principles will guide implementation of the strategy:

- **Research** into problems and analyses will focus on real data and its usage.
- Critical analyses will be **objective.** Analytical techniques that yield comprehensive assessments, such as random sampling of entire data systems, will be used rather than anecdotal investigations. Where practical, root cause analyses will be undertaken to identify systemic reasons for inadequate data quality, which will help formulate practical solutions.

- **Responsibilities** for finding solutions to data quality problems will be clear. Expectations for performance will be established.

- Implementation options to improve data quality will be **realistic** and feasible. In some cases, FY02 data quality assessments may examine a longer time period, but implementation options will be limited to remedying only the two most recent years of data.

III. Common Data Quality Issues

The data quality activities discussed in this Strategy are specifically aimed at identifying data that is missing, incorrect, or inadequate. Definitions of these terms are provided below.

Missing Data refer to required files, records or values that are not in the EPA national databases due to incomplete reporting by EPA Headquarters, EPA Region, a state agency, a local authority, or facility. This deficiency precludes accurate program evaluations and could suggest that important environmental work is not being done.

Incorrect Data are values within a field that do not accurately represent the true value. There are three main reasons for data in a required field to be incorrect. These reasons are data creation errors, data entry errors, and ambiguity in use of data fields.

Data Creation Errors: Programmatic staff can err while filling out forms that are forwarded to data entry staff or when entering data online. Some of these errors can be the result of ambiguity in guidance (see below), poorly designed data reporting tools, overlapping systems requiring a staffer to report the same data for entry into two or more systems, and lack of management emphasis on the importance of submitting complete, high quality data. Facilities may also generate errors in preparing required reporting (e.g., monthly discharge monitoring reports required by CWA permits).

Data Entry Errors: Mistakes may be made during data entry by data entry staff or, more rarely, by translator programs. Mistakes may also be due to a lack of data quality checks prior to data entry. For example, established procedures to verify the information on paper records (e.g., inspection reports, enforcement action reports, Case Conclusion Data Sheets) may be inadequate. Finally, there may not be sufficient training and tools provided to staff who enter data to ensure data are entered properly.

Ambiguity in Use of Data Fields: Misinterpretations and/or inadequate guidance concerning what data should be in required fields may result in inconsistency in values across Regions and states and others.

Inadequate Data are defined as records or fields that are not accessible or usable as currently maintained in EPA national databases. For example, data fields might exist in systems, but EPA does not require reporting or has allowed the fields to fall into disuse. Alternatively, new data needs may have arisen due to programmatic changes and the data systems were not modified to meet those needs. In other instances, inadequate data may result if regulations or policies have not been updated to match new goals, technologies, or systems.

IV. Data Quality Activities

This Data Quality Strategy proposes various activities to identify and correct current data quality problems. Annually, OC will develop an enforcement and compliance Data Quality Strategy Implementation Plan in consultation with Regions and states. The goal of the plan will be to identify specific data quality issues through periodic activities, such as audits and analyses. The outcome of these activities will be used to prioritize the order in which to address any data problems. Resulting analyses will be sent to Regions and states for review and correction where appropriate. Ongoing activities, such as the development of online correction, will be undertaken at the same time to address data quality problems that are long-term projects or may require activities on repeating schedules (e.g., training).

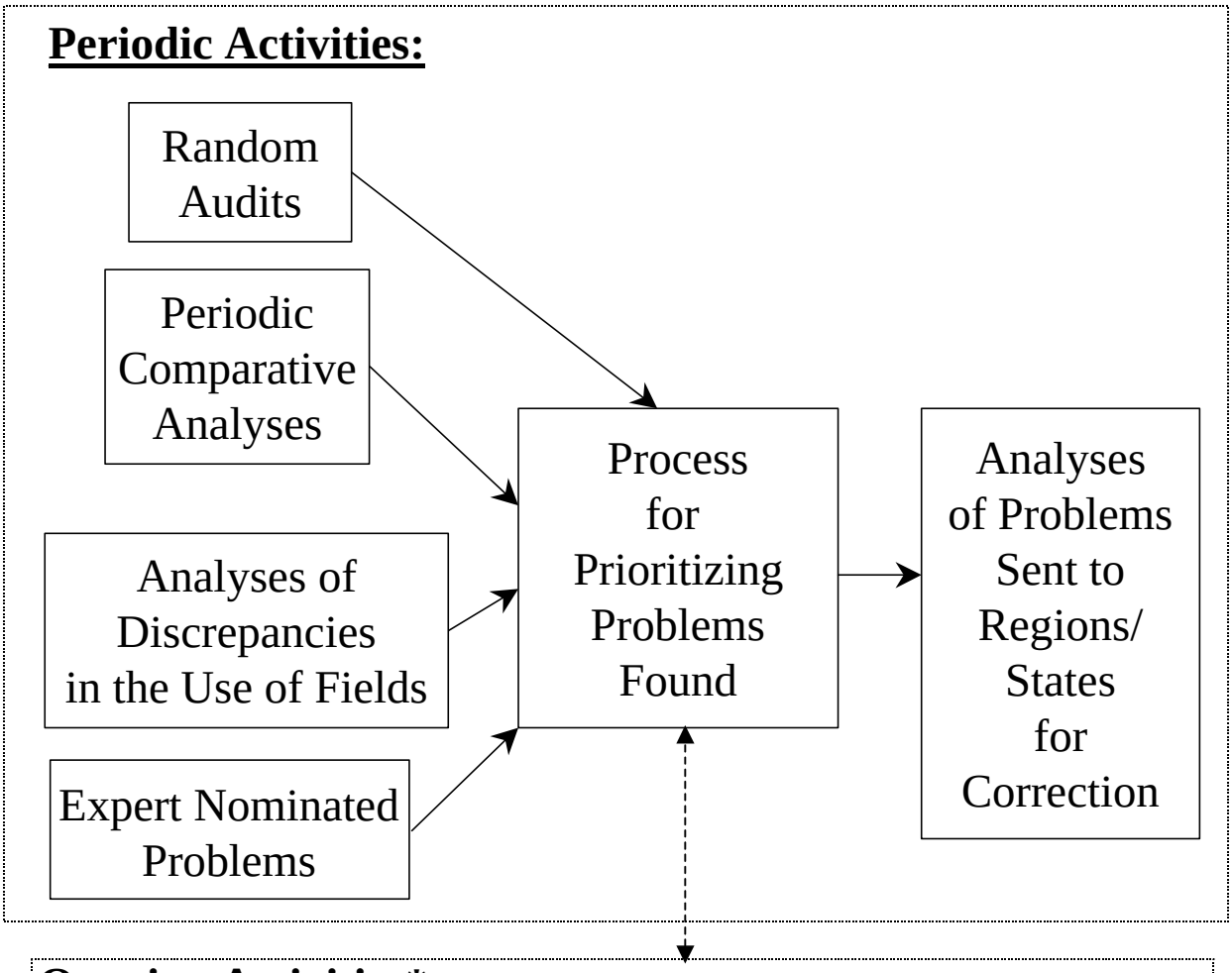
Proposed activities are organized and described in this section according to whether they are periodic or on-going. Figure 2 shows how the activities fit within the DQS and how they are expected to complement each other.

A. Periodic Activities

OC will develop an annual Data Quality Strategy Implementation Plan in consultation with the Regions and states. The plan will identify specific projects for the coming year. It will include relevant details and planning information for:

- identifying data errors;
- prioritizing problems found;
- selecting data quality projects and involving Regions and states; and
- sending analyses of problems to Regions and states for correction.

Figure 2: Activities Established by the Data Quality Strategy



Ongoing Activities*

- Internet error correction
- Developing, revising, and maintaining:
  - —training and tools for data entry clerks
  - —data entry and validation procedures
  - —policies and procedures to ensure the accuracy of the information on paper records
- Clarification of guidance on fields and new program guidance
- ICIS/Modernization efforts and changes to legacy systems

*Any of these ongoing activities may uncover problems that need to be addressed more formally. In addition, the solutions for some of the prioritized problems may result in revisions or new data entry procedures, clarification of guidance, or system changes/modernization.

Identifying Data Errors

Data problems will be identified through methods such as: random data audits; comparative analyses; analyses of discrepancies in the use of fields; and expert nominated problems. Each of these is described below.

- Random Data Audits. Data in selected key data fields will be independently evaluated through random data audits to validate its accuracy and completeness.

- Periodic Comparative Analyses. Periodically, comparative analyses of particular data fields across organizational units with delegated authority will be conducted to identify potential data quality problems. For example, comparing Significant Non-Compliance or inspection rates within Regions or states to the national average can be used to identify extreme outlying values that might indicate data problems.

- Analyses of Discrepancies in the Use of Fields. OC will analyze key enforcement and compliance activity data fields to determine if there are discrepancies in Regional or state usage. Discrepancies found will be documented, and guidance developed to assist program implementers and database users in how to use the codes for nationally consistent reporting.

- Expert Nominated Problems. Staff with significant experience and expertise with individual data systems (data system staff, program staff or expert users) will identify any quality issues they encounter. It is expected that such data quality problems will be identified from intensive usage, such as targeting and measures analyses. In addition, data problems found by comparing data required to be entered into more than one database can be used to reconcile information across data systems.

Prioritizing Data Problems Found

Once data problems are identified, they will be prioritized by a standing data quality workgroup that will consult with relevant stakeholders. Data quality efforts will focus on:

- data in the legacy database that will next be modernized;
- administrative priorities of stakeholder agencies and offices involved in management of each data system;
- EPA administration priorities;
- areas of concern raised by the Environmental Council of the States (ECOS), the Inspector General, EPA Management, Regional information users and managers;
- areas of concern discovered by methodologies for identifying data problems (see Figure 2, ‘Periodic Activities’);
- areas of concern raised by public access; and
- Regional and state review of assessments that confirm validity of the problems.

Selecting Data Quality Projects and Involving the Regions and States

Development of the annual Data Quality Strategy Implementation Plan will follow a structured decision making process. This process will resemble the one used for development of the FY02 Implementation Plan (Appendix 2) and is described below. Each year, OECA's MOA Guidance will specify the number of national data quality projects for EPA and states to work on during each year.

The process will start with an annual Data Quality Strategy workshop held in the spring. Participants will include staff from headquarters, Regions and state representatives. Workshop participants will:

- discuss issues related to the identification and implementation of the current year's projects; and

- brainstorm ideas for the next year's projects.

Sub-workgroups will be convened to build upon the discussions from the Data Quality Strategy workshop and to flesh out the projects to be recommended for implementation as well as methods for analyzing them. During the summer, the sub-workgroups will make their recommendations, which will then be sent to the entire Data Quality Strategy workgroup for review and comment.

The detailed implementation plan for the upcoming year will then be drafted and distributed to a wider set of stakeholders. This implementation strategy will be distributed for review and comment to the entire data steward community, including ECOS, before being finalized. Information on planning, assignment of responsibilities, progress, and results will be coordinated with Regions and states, via the Regions. State and Regions will have scheduled opportunities to communicate their comments on the projects to Headquarters.

Sending Analyses of Problems to Regions and States for Correction

Once the data quality problems are identified via Periodic Comparative Analyses, Analyses of Discrepancies in the Use of Fields, and Expert Nominated Problems and assessments are complete, and problems are researched and well documented, Regions and states will be informed of the problems through distribution of analysis reports in various formats (e.g., short DQ alerts, longer memoranda). These reports will describe in detail an identified data quality problem narratively, and, where applicable, graphically and quantitatively. They will be written for the selected problems and sent to the responsible Regions, states (via the Regions), and Headquarters personnel to alert them of potential data problem so they can correct the data already in the system and make any other changes needed to avoid the problems in the future.

B. Ongoing Activities

The following activities will be undertaken on an ongoing basis to uncover, prioritize and address data quality problems:

- Internet error correction;
- promoting accuracy of initial reporting, paper records, data entry, and validation procedures;
- updating a variety of guidance documents for activities that affect data quality; and
- updating data system documentation and support system modernization and ICIS development.

Many of these activities will be influenced by and will influence the periodic activities described in the previous section (see Figure 2). For example, data errors identified through periodic audits and analyses may spur changes to ongoing data quality work (e.g., revisions to data entry procedures, clarification of guidance, or system changes/modernization). In turn, the ongoing data quality activities will directly impact the types and number of data quality concerns.

Internet Error Correction

Currently available Internet error correction tools will be applied to particular records in need of correction. For example, OC will use information from the Headquarters, Regional, and state data steward networks, as well as the (Online Tracking Information System) OTIS site (and the Public Access Internet site when it becomes available) and its error correction process to pin-point data records within OC's national databases in need of correction. The Office of Environmental Information (OEI) is expected to improve the online system for informing data stewards at the Regional and state level about potential problems with individual records reported by data system users. OEI's system will also track the performance of Regional and state data stewards responsible for making corrections. Resources and encouragement from program management will be critical to ensure the continued and effective involvement of those data stewards responsible for responding to error correction requests.

Promoting Accuracy of Reports, Paper Records, and Data Entry and Validation Procedures

Regions and states are expected to commit resources to enter required data into EPA's national databases in a timely and accurate manner. The following are examples of activities OC may undertake, or encourage the Regions and states to undertake, to ensure that data quality procedures are accurately documented and followed.

- Utilize and document existing edit and validation checks in the legacy databases, and make recommendations for new edit and validation checks to be incorporated into ICIS as the databases are modernized. As part of OC's Quality Management Plan (discussed in the Appendix 1), Data System Quality Assurance Plans will be developed for the each of

the data systems for which OC has primary responsibility. The Data System Quality Assurance Plans will describe the existing and planned editing checks and validation procedures that are part of each data systems.

- Develop new policies and procedures to minimize data errors stemming from the filling in of field reports and paper records (e.g., inspection reports, enforcement action reports, case conclusion data sheets). Distribute these procedures to the staff responsible for entry. This may include procedures for tracking documents and standardizing document storage. Some examples of existing database policies and procedures for minimizing data errors prior to data entry are listed in Appendix 6.

- Provide training for all staff generating and entering data that ultimately resides in EPA's data systems. Policies and procedures may need to be reviewed for delegated programs directly entering data into EPA's national databases as well as for states using translator programs.

- Where the training of data entry personnel is adequate, review the rejected transactions for a specific period of time. In some cases, the data problems may be due to a "process" rather than data entry errors. For instance, duplicate discharge monitoring reports (DMRs) for the NPDES program may be continuously routed for data entry, causing numerous "record on file" rejects.

- Inform Regional and national program management of the need for sufficient resources to support the implementation of more comprehensive and accurate data entry and verification procedures. Please refer to Appendix 6 for examples of existing policies and procedures for minimizing data errors. For example, disinvestment in accurate, complete data entry and correction for NPDES minors in the Permit Compliance System has eroded the quality of enforcement and compliance data for this universe of over 87,800 facilities.

- Conduct a one-time review of instructions for data submission to ensure that Regions and states provide data in formats consistent with data system requirements (e.g., values and/or formats should be consistent with data system or translatable with full documentation).

Updating Data System Guidance

Data system guidance and documentation will be updated to address discrepancies in the use of key enforcement and compliance activity database fields. Fields that are inconsistently used by Regions and states could stem from different understandings of how database fields are to be used, or from outdated media-specific program guidance.

System Updates and ICIS/Modernization

OC will work to maintain current, well documented system data dictionaries for those systems run by OC. Such efforts to create and maintain all required documentation will be explicitly called for as part of OC's Quality Management Plan. These data dictionaries should provide clear definitions of data fields and, when necessary, clear definitions of programmatic terms, such as, what a "final judicial order" means for the RCRA program.

OC will also work with the modernization team to ensure that the data quality improvements recommended by the Data Quality Strategy are built into the modernized data systems.

V. Regional and State Implementation of the Strategy

Since Regions and states are responsible for entry of enforcement and compliance information, their active participation in data quality efforts is critical. OECA's Memorandum of Agreement Guidance will continue to specify the Region's level of commitment to implementing the DQS.

OC will propose the following efforts to ensure Regions and states implement the activities of this Data Quality Strategy:

- Provide yearly quality assurance awards to states.
- Do not give credit for program actions and results that are not entered in a national database. Notify programs, Regions and state staff and management of this policy.
- Make any OECA discretionary extramural funding given to states dependent on whether the state commits to and prioritizes maintaining quality data. Maintaining quality data includes providing the data in a form consistent with EPA data system requirements and codes.

Coordinating with Other Key Activities

The proposed data quality planning, implementation, and assessments will be coordinated with other activities to further encourage state and Regional participation in data quality efforts. These activities are listed below.

- Highlight data quality issues in the Regional profiles that are provided to senior management.
- Expand program status review reports to include additional data quality information.

- Publish data quality statistics for Regions to promote positive peer pressure.
- Communicate findings related to database design issues that affect data quality to the ICIS team.
- Raise data quality issues through the Enforcement and Compliance Performance Board.
- Provide annual expectations for data quality goals and/or participation in data quality activities in MOAs.
- Emphasize data quality in National Environmental Performance Partnerships (NEPPS) and grant guidances.

VI. Conclusion

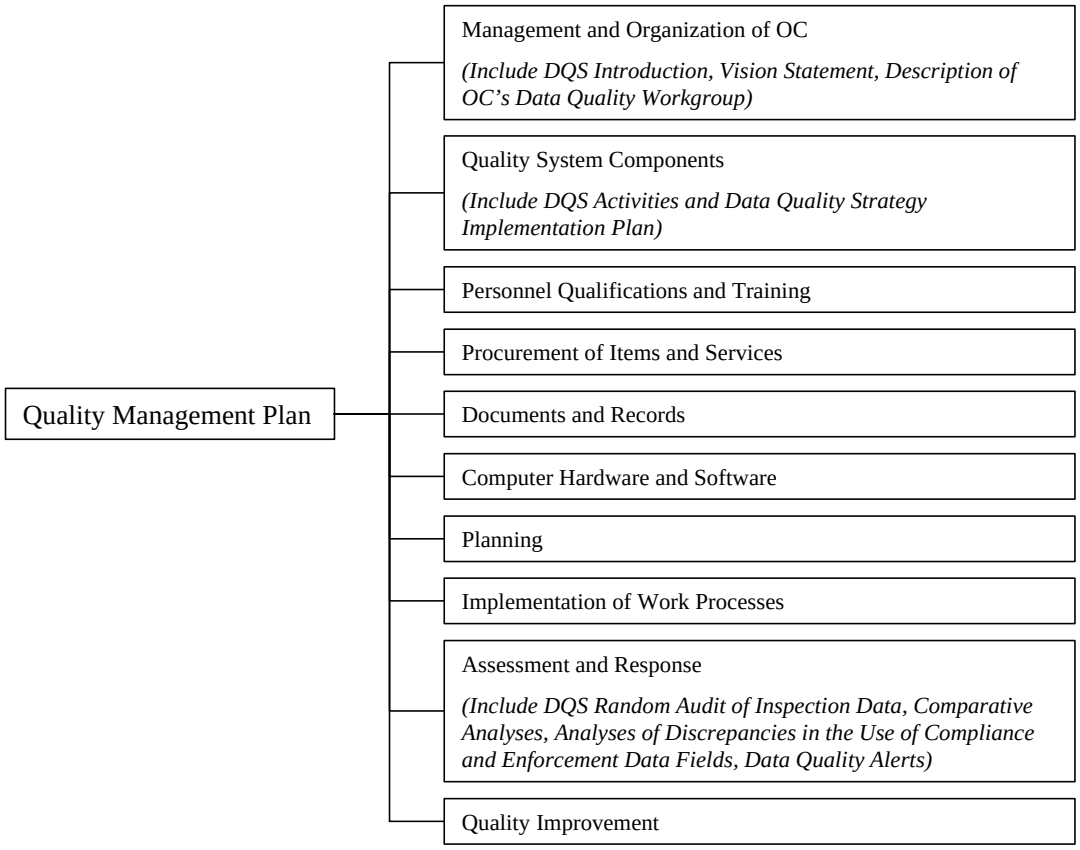
In FY2001, the Office of Compliance began developing this Data Quality Strategy (DQS) for assessing and actively managing the quality of enforcement and compliance information. The DQS sets forth the National Enforcement and Compliance Program's vision for assuring that the data used to support enforcement program decisions are sound and accurately reflect the activities and accomplishments of the program. The DQS also calls for a variety of data quality assessments of EPA data systems which will be undertaken in FY2002 and subsequent years.

Appendix 1

The Data Quality Strategy and the Office of Compliance Quality Management Plan

The updated OC Office-level Quality Management Plan (QMP) will detail how components of the DQS, such as data quality assessments, will inform ongoing planning and implementation of data quality activities and data system management. Figure 1 shows an outline of the major sections in OC's Quality Management Plan and how portions of the Strategy will fit within it.

Figure 1: How the Data Quality Strategy Fits Within OC's Quality Management Plan



Appendix 2

Process for Developing the Enforcement and Compliance Data Quality Strategy and the FY02 Data Quality Strategy Implementation Plan

On May 21, 2001 a call memorandum was sent from Michael Stahl asking for workgroup members to develop a Data Quality Strategy for Enforcement and Compliance Data. Representatives from the media program offices and staff who work directly with EPA maintained enforcement and compliance national databases (DOCKET, AFS, PCS, RCRAInfo, FTTS, and SDWIS) signed up for the workgroup as well as Headquarter personnel (particularly those involved with measures, targeting, and data system management).

On June 20, 2001, a Data Quality Strategy workshop was held in Washington. This served as the first workgroup meeting. There were presentations at the workshop on:

- an overview document providing a vision statement, definitions, and an initial outline of the Data Quality Strategy,
- methodologies for identifying, validating, and correcting of data problems and Errors;
- data errors on the front end; and
- documentation, guidance, and modernization – their impact on data quality.

In addition, we had brainstorming sessions in the afternoon. Discussions included:

- various options for conducting the identification and correction of errors;
- coming up with a list of problems we know about in terms of data entry;
- coming up with a list of policies and procedures for entering data; and
- coming of with lists of database fields needing clarification.

On June 28, 2001 summaries of the three breakout sessions were sent to the entire Data Quality Strategy workgroup. On July 6, 2001, the next version of the vision statement, definitions, and outline of the Data Quality Strategy was sent to the workgroup for comment along with documents which grouped the information from the three June 20 workshop breakout sessions

into categories and tasks. We asked workgroup members to get back to us with comments on these documents and the tasks they preferred to work on.

From these responses two sub-workgroups were created:

> 1) Tasks on Methodologies for Identification of Data Problems and Correcting Errors (led by David Sprague)
>
> 2) Tasks on Potential Fields Needing Clarification: Know Areas where Potential Misuse or Inconsistent Use is Occurring (led by Lynn Vendinello)

We also sent a list of overall, cross-cutting tasks for which we requested input from as many as people as possible.

We did not initiate a sub-workgroup on Data Quality on the Front End. We asked the data system managers to provide us with write-ups describing what data entry and validation checks are already programmed into our national databases. On June 18, 2001, we requested the Data Quality Strategy workgroup members provide us with information on policies and procedures their Regions and states have to ensure the accuracy of the information on the paper records (e.g., inspection reports, enforcement action reports, case conclusion data sheets) **before** they are transmitted to data entry staff. We also requested information on what training and tools are provided to staff who enter data to ensure the data will be entered accurately.

The number of data quality projects which are being recommended for FY02 were decided upon by the data quality and targeting teams of the Information Utilization & Targeting Branch (IUTB), and OC management consensus. The sub-workgroups and the data quality and targeting teams of IUTB recommended projects. Appendix 3 provides an overview of the data quality projects planned for implementation in FY02. Appendix 4 describes the projects in more detail and presents a schedule for implementation. Appendix 5 presents a schedule for FY03 projects. The Potential Fields Needing Clarification sub-workgroup helped decide which fields will be analyzed and how the analyses will be done. The Identification of Data Problems and Correcting Errors sub-workgroup helped develop the Random Audit of Inspection Data project as well as the Comparative Analyses charts. The decisions made by these sub-workgroups were made with consultation from the data quality and targeting teams of the Information Utilization & Targeting Branch (IUTB). In addition, the targeting team of IUTB nominated two data quality alerts to be sent to the user communities early in 2002.

The next step in the review process was to send the recommended data quality projects and analyses to the entire Data Quality Strategy workgroup for review and comment. For example, the entire Data Quality Strategy workgroup were sent:

1) the proposals for how to analyze the four codes needing clarification,
2) the proposed methodology for conducting the random audit of inspection data,

3) sample periodic comparative analyses charts,
4) two data quality alerts proposed by the targeting team of IUTB.

Since the Data Quality Strategy workgroup is composed of headquarters and Regional database and program representatives, as well as one state representative, their input was essential.

Once the comments by the Data Quality Strategy workgroup were received, the FY02 Data Quality Implementation Plan was completed. This plan provides detailed outlines of all the data quality projects which will be conducted in 2002. Before finalizing the plan, the Implementation Plan was sent to all the affected user communities, including ECOS, for their review and input.

Appendix 3

Overview Chart of the FY02 Data Quality Strategy Implementation Plan

DQ Activity	Random Audits	Comparative Analyses	Fields Clarifications	Data Quality Alerts
Level of Activity	One per year	Analyses of 4 indicators, three media projects issued semi-annually	New fields are to be analyzed each year	2 issued annually
Current Proposed Project	Inspection Fields of AFS, PCS, and RCRAInfo	Inspection Coverage, formal enforcement actions, penalties and SNC data in AFS, PCS, and RCRAInfo	PCS Enforcement Action Codes 4 RCRA fields	One Air; One RCRA
Correction/ Identification Method Proposed	Select permits/facility ID's randomly. Post inspection data from national data systems for those ID's on website.	State level values compared against national averages	Investigate current usage of data fields and bring findings back to workgroup	Discoveries currently being brought to workgroup attention.
Regional Involvement	Compare paper records to posted data on website. States/Regions can indicate discrepancies online.	Follow-up with states that show low outlier values (e.g., less than half the national ave.).	Workgroup established to develop responses for each field needing clarification.	Clean up data as indicated
State Involvement	Compare paper records to posted data on WEB site. Indicate corrections	States with low outlier values will have to certify validity of data or explain problem.	Workgroup established to develop responses for each field needing clarification.	Clean up data as indicated

Appendix 4

Description and Schedule for Implementing FY02 Projects

The following Appendix describes the projects that OC plans to implement during FY02. An implementation schedule for FY02 projects is presented at the end of this appendix. For further information on any of these projects, please contact David Sprague (sprague.david@epa.gov).

A. Random Audits

Objective: To quantify the accuracy and completeness of selected fields as maintained in the federal data systems.

Example of the type of statements that will be supported by the audit results: "The inspection information maintained by EPA is 95% accurate. Based on the survey methodology used, we are 95% confident that this error rate is within 3% of the true value."

- This year's audit will examine inspection data only.

- The audit will focus separately on populations within each of the three media databases:
  - ✓ Facilities subject to CAA programs as defined by the RECAP universe = 42,075
  - ✓ Facilities with active, major water permits = 6,670
  - ✓ Facilities defined as TSDs and LQGs in RCRAInfo = 23,046

- An audit of 8 facilities per program and state is designed to minimize respondent burden for the Regions and states and will yield statistically valid results with which to characterize accuracy of inspection information in the national data systems.

- Reviewing this number of facilities should provide a large enough sample size to have 95% confidence in the results, with an error rate of +/- 3%.

Random Audits: Comments and Responses

The following comments were made by states and Regional staff on earlier drafts of the audit methodology:

- **Comment:** The universe of facilities sampled should include more facilities from larger states and less from smaller states.
  Response: In developing the random audit, OC was sensitive to not overburdening individual states. The sample size of eight is based on the number of permit IDs necessary from the largest states (in terms of federally reportable inspections) to obtain results that allow EPA to be 95 % confident that the results are within a reasonably small confidence interval. The sample size of eight does lead to over sampling from smaller

states. This over sampling of some states should provide a cushion by helping to address the possibility that some states will not fully participate. Statistical weighting of the audit results will adjust for over sampling in some smaller states.

- **Comment:** States should be able to check the hard copy data against their state/local data system at the same time they check the data on the proposed Data Quality Website.
  Response: Others in the workgroup believe that it is not always the same person who would check the hard copy and the state/local data systems. To reduce confusion and workload, OC feels that it is appropriate to keep the focus of the random audit on checking discrepancies in the federal data systems. A follow-up request to check state/local data system will be made only if discrepancies are found.

- **Comment:** States will need notification regarding this effort during the once a year EPA/state MOA or PPG negotiations.
  Response: This is a relatively small effort and is directly related to compliance with the Data Quality Strategy. As such, it should be considered as included in the previously negotiated MOAs. In developing the random audit, EPA was sensitive to not overburdening individual states. In any given state program, checking eight records is not expected to be a significant burden.

B. Comparative Analyses

Objective: To identify potential data quality problems (outliers) by comparing state-level statistics to an established benchmark (i.e., ½ national average).

The following activities are proposed for FY02:

- Comparative analyses charts for RCRA, CWA, and CAA which show all the states sorted by percentages and will include:
  - ✓ Inspection coverage
  - ✓ Ratio of formal enforcement actions to number of facilities inspected
  - ✓ Ratio of HPV/SNC facilities per facilities in violation

- The Regions overseeing states that fall below a performance threshold (i.e., one-half the national average) would be sent a memorandum asking them to
  - ✓ discuss the findings of the comparative analyses;
  - ✓ certify data is accurate; and
  - ✓ determine cause for missing data.

- Comparative Analyses: Comments and Responses

Comments by members of the Workgroup included:

- **Comment:** For air, comparative charts of enforcement actions/total # facilities and HPVs/total # facilities make more sense than having # of inspections and # violations as the denominators.
  Response: Using the number of inspections in the denominator is an appropriate measure of data quality, rather than using the number of facilities. This approach to the data quality assessment of actions takes into account two factors that are expected to be related to the reported number of actions: 1) the number of facilities and 2) the number of inspections (the amount of effort put forth by the program). The same logic applies to the SNC analysis. That is, disregarding the level of effort put forth by the program will change the results and highlight states that do not have many facilities in violation.

- **Comment:** It would be good to coordinate these analyses with the annual audits Regions conduct of states regarding specific facilities.
  Response: The Regions are encouraged, as much as possible, to coordinate the concerns raised by these analyses with their audits of their States.

C. Fields Clarification

Objective: Identify discrepancies in the use of key enforcement and compliance data fields.

- RCRA Fields Clarification: The workgroup of Regional and Headquarters members have participated in a series of conference calls to identify the appropriate use and definition of informal vs formal action codes, and the applicability of corrective action codes as they pertain to the enforcement program. The group has received input from the RCRA and Corrective Action enforcement program offices indicating the appropriate use of existing codes to address enforcement and/or corrective action remediation. A guidance package is being developed and will include specific scenarios to assist program implementers in determining how to use the codes for nationally consistent reporting. Completion of the draft guidance package is expected by mid-March, 2002.

- Four RCRAInfo codes were examined:
  - ✓ RCRA New Violation or Roll-Over of Existing Violations,
  - ✓ Appropriate Entry of Formal and Informal Actions,
  - ✓ RCRA 500 vs. 600 Series,
  - ✓ Corrective Action Codes in the Enforcement Module.

- In addition, a DQ sub-workgroup identified one PCS code for study:
  - ✓ Compliance Schedule Event Codes

Fields Clarification: Schedule

- Donna Inman is working on the necessary guidance and clean-up related to the 4 RCRA codes studied.

- The PCS Enforcement Action Clean-up guidance will be distributed in final soon.

- A workgroup has not begun yet to work on clean-up of the compliance event schedule codes in PCS.

D. Data Quality Alerts

Objective: Address data quality problems identified by data users (e.g. targeting, measures, and Regional analysis)

- Two Data Quality alerts have been chosen:
  - ✓ HPV facilities being entered into AFS without any underlying violations being entered into the system.
  - ✓ Regions and States failing to close out violations in RCRAinfo

- Two more data quality alerts will be written and distributed later in the year

Data Quality Alerts: Comments and Responses

- **Comment:** Some reviewers misunderstand the concept of a Data Quality Alert.
  Response: Language will be added to the Data Quality Alerts describing their purpose and what responses are expected from the Regions and States.

- **Comment:** Manual updating of the HPV flag is no longer necessary. The excerpt from Appendix A of the T&A HPV Workbook does not reflect this.
  Response: Clarifying language will be added to the CAA data quality alert to respond to these concerns.

- **Comment:** Facilities could have come into compliance more than 2 years ago but still have HPV status since not all penalties have been paid yet. This effort may prove to be a lot of work with little return if the data is found to be valid for many facilities.
  Response: Clarifying language will be added to the CAA data quality alert to respond to these concerns.

Appendix 4: Schedule for FY02 DQ Strategy Implementation Projects (Page 1 of 2)

♦ = Will happen within specified week
|—| = Will happen over specified weeks
- - - = Will happen sometime during specified time period

Week of:	2/18	2/25	3/4	3/11	3/18	3/25	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30
Data review prior to public access announced					♦																												
Data review for public access site						|									|																	
Release of public access site																- - -	- - -	- - -	- - -														
FY02 Audit instructions sent out						♦																											
State and Regional audit of sampled inspection records						|																										
Distribute, and Regional/State review of FY02 Audit preliminary results											|			|																		
Comments on FY02 Audit prelim results due													♦																				
Distribute FY02 Audit final results														♦																			
Clean-up of RCRA fields	|									|																						

Appendix 4: Schedule for FY02 DQ Strategy Implementation Projects (Page 2 of 2)

Week of:	2/18	2/25	3/4	3/11	3/18	3/25	4/1	4/8	4/15	4/22	4/29	5/6	5/13	5/20	5/27	6/3	6/10	6/17	6/24	7/1	7/8	7/15	7/22	7/29	8/5	8/12	8/19	8/26	9/2	9/9	9/16	9/23	9/30
Distribute, and Regional/State review of 1st Comparative Analysis & "HPVs in AFS" DQ Alert											|	—	—	—	—	—	—	—	—	—	—	—	|										
Responses due from "HPV DQ Alert"																				♦													
Responses due from 1st Comparative Analyses																							♦										
Undertake 2nd FY02 Comparative Analysis																											|	—	—	|			
Distribute, and Regional/State review of 2nd FY02 Comparative Analysis																														|	—	—	|
Distribute, and Regional/State review of "Closing out violations in RCRAInfo" DQ Alert																									|	—	—	—	—	—	—	—	|
Responses due from "Closing out violations in RCRAInfo" DQ Alert																																	♦

♦ = Will happen within specified week
|— | = Will happen over specified weeks
- - - = Will happen sometime during specified time period

Appendix 5

Schedule for Implementing FY03 DQ Strategy Projects (Page 1 of 2)

♦ = Will happen within specified month
|—— | = Will happen over specified months
- - - = Will happen sometime during specified time period

Month of:	4/02	5/02	6/02	7/02	8/02	9/02	10/02	11/02	12/02	1/03	2/03
Workshops to identify FY03 Data Quality Projects	♦										
Sub-workgroups meet /plan work for FY03 projects		|———————|									
Put language in MOAs regarding Regions implementing/overseeing FY03 DQ projects		♦									
Undertake and distribute for review two Misuse of Fields & Comparative Analyses			|———————|								
Comments due on Misuse of Fields & Comparative Analyses				♦							
Distribute draft of FY03 Implementation Plan for to DQ workgroup for review				|———————————————————|						
Comments on FY03 Implementation Plan due							♦				
Incorporate comments on FY03 projects							♦				

Schedule for Implementing FY03 DQ Strategy Projects (Page 2 of 2)

Month of:	4/02	5/02	6/02	7/02	8/02	9/02	10/02	11/02	12/02	1/03	2/03
Initiate workgroups to conduct data fields clean-up and guidance efforts								♦			
Undertake FY03 Audit								|———————————|			
Distribute for review FY03 Audit preliminary results										|———————|	
Distribute FY03 Audit final results											♦
Undertake and distribute for review FY03 Periodic Comparative Analyses & DQ Alerts								|———————|			
Distribute FY03 Audit final results									♦		

♦ = Will happen within specified month
|—— | = Will happen over specified months
- - - = Will happen sometime during specified time period

Appendix 6

Examples of Existing Policies and Procedures for Minimizing Data Errors Prior to Data Entry for Our Legacy Data Bases

A few examples of policies and procedures used by Regions and States to minimize data errors during entry into legacy data systems and to ensure the accuracy of information are presented below.

A. Region 3

PCS

Upon return from performing an inspection, the inspector/technical staff member is responsible for completing a regional **inspection form.** The form was created by the PCS Coordinator to collect inspection data and contains fields for collecting permit type information for those facilities that do not have an NPDES permit and are categorized as unpermitted, general, stormwater, etc., making it necessary to create a record in PCS before the inspection can be entered. The form provides a list of all inspection types, inspectors, facility types, and their associated codes. It's purpose is to provide quick and easy access to the information and required fields to enter inspections into PCS. (The inspection form 3560-3 has not yet been updated to include all of the new inspection type codes).

Once inspections have been entered into PCS, the weekly audit reports are checked to ensure acceptance of the inspection. If an inspection was rejected, the problem is resolved and the inspections are re-entered. A retrieval is also pulled to compare the inspections listed in PCS against the inspections sheets that have been collected for the month. For quick checks, an on line verification is used.

A similar process has been set up to collect **enforcement action data** using a created Enforcement Action (EA) Summary Sheet for PCS which list only those enforcement actions used by Region 3 and it's States. The sheet is comprised of enforcement actions and compliance schedules by name and code, it provides the name of the initiator, the date completed, permit number, action date, issued by, docket number, whether it's permitted or unpermitted, associated NPDES number and name, space to list any EA related compliance scheduled events, reason for the EA, and provides Close Out information. This form has been in existence for the past 15 years. It places all necessary information relating to the EA at your finger tips.

To QA enforcement action data in PCS, active enforcement actions and any associated compliance schedules are pulled and circulated among the technical staff. The staff review and update the EA status (e.g., amendments and close outs). This process is performed quarterly.

The Region has shared these procedures and tools with their States. The States of Maryland, Pennsylvania and West Virginia have similar procedures in place for the QA/QC of their data.

B. Region 6

In the RCRA program, after the State and EPA staff return from their inspections, they write up their inspection reports. All of Region 6's state and regional staff have peer review meetings in their Agencies to discuss potential violations. Besides other inspectors/enforcement officers, the Region also invites a lawyer to attend the meetings. Enforcement actions are written and case conclusion data sheets are completed (for EPA only) and attached to the enforcement action before the record is put into concurrence.

The States data (inspection/violation/enforcement) is usually reviewed by a supervisor before it is given to data entry personnel. Each one of the five States operates differently. The States have been informed for many years that they must have all inspection and enforcement actions in the data system at the time that reports are pulled for their mid-year and end-of-reviews. When discrepancies are discovered on the data reports, State personnel are called to resolve them. At the Regional office, all data information pertaining to inspections, violations and enforcement actions are reviewed in the Hazardous Waste Enforcement Branch by a program person who is the liaison with the Regional RCRAInfo group, located in the Information Management Section.

State data entry clerks receive Regional and National training once a year. In addition, they call Region 6's data personnel if they need any help. The Region pulls an Orphan/QA report for States and EPA data once a month. This report denotes data entries that are not properly linked. Also, the Region’s data group has developed other reports that they run regularly to check the Region's data.

C. Region 7

CAA

Region 7 does not have any established policy to ensure accuracy of data as it relates to the Air Program. Data entry into the Air Facility Subsystem (AFS) is paper-driven meaning a form is completed by the inspector or case review officer and given to the data entry person to enter the data into AFS. The region performs a cursory review of the data from time to time, but there are no policies in place to correct any data discrepancies.

Docket

When an administrative case has been filed with the Regional Hearing Clerk(RHC)/Docket Analyst, the attorney assigned to the case, completes a Case Initiation Data Sheet (CIDS) and hands this form to the RHC/Docket Analyst, who then enters this initial information into Docket. Upon the conclusion of the case, the staff attorney completes the Case Conclusion Data Sheet (CCDS) which is then given to an attorney for review. After the review process, the form is given to the RHC/Docket Analyst for her to enter the information into Docket. The data contained in Docket is frequently reviewed by the Deputy Regional Counsel. Also if the Docket Manager at Headquarters notices any data discrepancies, he immediately notifies the RHC/Docket Analyst of any mis-information who in turn corrects any data discrepancies. Monthly conference calls and annual meetings are also held.

RCRA

RCRA Information is entered based on what the compliance officers provide. A mechanism used to ensure data quality is RCRA fact sheets. RCRA fact sheets include lists of data elements that the user is supposed to enter into the system, as well as explanations of how the database is structured and how to assure proper data entry. Also, much of the input into the RCRAInfo database is based on letters, notification/inspection forms and telephone conversation records received. The originator of the information is contacted concerning any questions the data analyst may have. RCRAInfo training has been provided to the states. RCRAInfo conference calls are attended monthly along with annual RCRAInfo training.

D. Region 9

Region 9 has built a Lotus Notes system for reporting enforcement data to the DOCKET Coordinator. By eliminating paper forms, and by programming edit checks, help prompts etc. data quality has been significantly enhanced for the most recent two year period in comparison to historical trends.

MEMORANDUM

SUBJECT: Enhancing EPA's Compliance Assistance Programs

FROM: Sylvia K. Lowrance
Acting Assistant Administrator

TO: Regional Administrators, Regions I-X

The purpose of this memorandum is to recommend a number of actions to enhance EPA's compliance assistance programs and encourage compliance assurance strategies which give due consideration to the full range of compliance and enforcement tools. To achieve Goal 9 of EPA's Strategic Plan ("provide a credible deterrent to pollution and greater compliance with the law"), EPA will need to use all its tools - assistance, incentives, monitoring and enforcement - in an integrated fashion to promote compliance with environmental requirements. As you may recall from the FY2003 Operating Year Priorities Meeting in January, the Office of Enforcement and Compliance Assurance (OECA) has identified better integration of compliance assistance into our enforcement strategies as one of five priorities for the national program.

In order to identify ways of better integrating our compliance assurance efforts, managers from the Office of Compliance's (OC) Compliance Assistance and Sector Programs Division visited all ten regions to discuss the national and Regional compliance assistance programs. Based on these visits and other analyses, we have identified steps we all can undertake to strengthen the foundation of the compliance assistance program. We discussed the results and recommendations of these visits at our Senior Enforcement Managers Meeting in San Francisco in January. During that meeting, we discussed four basic actions Regions can take to improve regional compliance assistance programs. We also agreed to form a senior level steering committee to deal with compliance assistance policy and implementation issues at the national level. This memorandum outlines the recommendations for the Regions and the charge for the National Steering Committee on Compliance Assistance Policy and Infrastructure (CAPI).

BUILDING AN EFFECTIVE COMPLIANCE ASSISTANCE PROGRAM

The Regional visits identified several characteristics which seemed to enhance Regional compliance assistance programs. Each of these are described below:

1. Management Support. The strongest Regional assistance programs provide **support for compliance assistance at all management levels** - senior, mid-level and front-line. Management needs to provide perspective about using the appropriate mix of tools to address noncompliance and highlight the value of integrated strategies in increasing both the efficient use of resources and program effectiveness.

2. Organizing Mechanism. A second important characteristic of effective compliance assistance programs is establishment of a **formal network**, **workgroup or other mechanism to foster communication and coordination** among internal regional compliance assistance practitioners as well as with external environmental assistance providers. For example, some regions have created a formal compliance assistance workgroup of compliance and program personnel. The establishment of a central coordinator for compliance assistance can be a tremendous asset in establishing and maintaining these mechanisms. Other Regions have chosen to create an **organizational structure** that facilitates communication and coordination among the compliance assistance, enforcement, monitoring, program and pollution prevention personnel.

3. Other Characteristics. Regional programs which possess the building blocks of a strong compliance assistance program may also exhibit a variety of the following secondary characteristics which strengthen their programs:

- **Undertake initiatives using a problem-solving approach** which considers all appropriate compliance assurance tools. Region II used this approach in its universities initiative to identify the environmental problems that needed to be addressed and develop a strategy that utilized compliance assistance, incentives, monitoring and enforcement;
- **Practice strategic coordination and planning between the Region and states** on national and Regional compliance assistance priorities and activities. Region VI, for example, meets with its states on compliance assistance priorities as part of the state grant and MOA negotiations;
- **Employ proactive efforts to target environmental problems** that could be addressed, at least in part, by compliance assistance.
- **Support inspectors who make compliance assistance part of their routine activities**;
- **Use measures of success** to highlight results and efficiencies of combined or integrated efforts to address significant problems. Region III managers recently launched two compliance assistance outcome measurement projects over the course of two summers to assess behavioral, process and environmental changes at facilities.

TAKING ACTION TO STRENGTHEN THE PROGRAM

The characteristics discussed above are based on the best practices from our analysis of Regional compliance assistance programs. Each Region should begin efforts to ensure the following components are in place to strengthen the compliance assistance program in particular and the compliance assurance program overall.

1. Establish a Regional Compliance Assistance Coordinator

Creating this position recognizes that compliance assistance is a vital and dynamic part of EPA's mission and will provide a focal point for information on, and organization of, ongoing compliance assistance activities. A more detailed description of the Coordinator's role is outlined in Attachment 1.

Coordinators should be senior people who can articulate the Region's vision and commitment to compliance assistance and be knowledgeable about the Region's efforts. In addition, Coordinators should be able to interact effectively with Regional enforcement and compliance monitoring personnel, and the Office of Compliance's Regional Analysts. Coordinators should have access to regional senior managers on compliance assistance issues. Ideally, they will work with or for the Regional Enforcement Coordinator or the Enforcement Division Director, and perform in a manner similar to MOA, pollution prevention and federal facilities coordinators.

The Coordinator position should utilize the expertise already developed by Regional compliance assistance staff, particularly members of the Agency-wide workgroup that helped develop the National Compliance Assistance Clearinghouse, the Compliance Assistance Activity Plan, and the Compliance Assistance Forum. We foresee that the Coordinator's responsibilities will entail 0.5 to 1 FTE per Region. Seven additional FTE have been redirected to the compliance assistance program component in FY 2002 for distribution among the ten regional offices which can help cover resources for the Coordinator position.

2. Establish a Formal Compliance Assistance Communication Network

Establish a mechanism to facilitate ongoing communication, coordination and planning among compliance assistance and other environmental assistance providers both within the Regional office and with states and other external parties. Some Regions have created formal workgroups, teams, and /or e-mail group lists to make Regional assistance efforts more visible, strategic and effective.

3. Coordinate with States on Compliance Assistance Planning

In preparation for the next MOA cycle, each Region should coordinate with its states in planning for compliance assistance activities to support national and regional priorities as well as core activities. Preplanning with the states on compliance assistance is, in fact, an element of the Core Compliance Assistance Program (Attachment 2). Few Regions actually discuss compliance assistance strategically and as part of the overall compliance assurance program in planning how to fulfill MOA commitments.

4. Strategically Build Compliance Assistance into the National and Regional Planning Processes

Beginning in FY 2003, use the Compliance Assistance Projects Reporting Form to help strategically integrate compliance assistance into your overall compliance and enforcement program. This form was piloted in FY2001 by five Regions and was effective in ensuring management engagement and coordinated up-front planning during the MOA process. Based on discussions with these Regions and analysis of Headquarters information needs, we have revised the form for use by *all* Regions. Further, ensure that staff are familiar with the revised Core Compliance Assistance Program (Attachment 2) that is part of the FY 02-03 MOA guidance. The guidance sets out the current compliance assistance activities that should be a part of your compliance assurance program.

ESTABLISHING THE COMPLIANCE ASSISTANCE POLICY AND INFRASTRUCTURE (CAPI) STEERING COMMITTEE

At the Senior Enforcement Managers Meeting in San Francisco in January, 2002 several issues surrounding the basic infrastructure and policies of the national compliance assistance program were raised. There was general agreement that a senior level steering committee was needed to improve the policies and infrastructure of the compliance assistance program to ensure that it is more fully integrated with the national compliance assurance program. This steering committee will make recommendations to the senior managers that build on the four basic actions identified above and will also include the following issues :

1. Reviewing the core compliance assistance framework for both the national and regional programs and suggesting changes to ensure a strong compliance assistance infrastructure;
1. Identifying ways to integrate compliance assistance more prominently in the MOA process;
2. Creating and using common measures for results of compliance assistance activities and highlighting compliance assistance achievements in the Annual Performance Report and other venues;
3. Developing a strategy to pilot integrated strategies in FY 2003 across the Regions that includes measurable results for compliance assistance.

The Office of Compliance will be establishing this Steering Committee over the next month, and will be requesting the participation of several Regional and Headquarters managers. Once the group is established, we will outline the membership and the specific charge on an upcoming Senior Managers conference call in early March. Our expectation is that this group will formulate recommendations on these issues for us to discuss at the next Senior Managers meeting this summer.

Thank you for helping to improve the overall compliance and enforcement program by strengthening your compliance assistance programs. Please send the name of your Compliance Assistance Coordinator to Deborah Thomas, Chief of the Compliance Assistance Policy and Integration Branch by **March 14, 2002**, at mail code 2224, by fax at (202) 564-7083, or by E-mail at Thomas.Deborah@epa.gov. Please feel free to contact Michael Stahl, Director of the Office of Compliance, if you have any questions concerning this memorandum.

Attachments

cc: Deputy Regional Administrators
Michael Stahl, Office of Compliance
Lisa Lund, Office of Compliance
Eric Schaeffer, Office of Regulatory Enforcement
Connie Musgrove, Office of Regulatory Enforcement
Division Directors, Office of Compliance and Office of Regulatory Enforcement
Regional Enforcement Division Directors and Coordinators
EPA Compliance Assistance Workgroup

ATTACHMENT 1

THE ROLE OF THE COMPLIANCE ASSISTANCE COORDINATOR

- **Regional Expert:** Serve as the "expert" within the region on regional compliance assistance priorities, strategies, and performance measurement.

- **Regional Coordination:** Serve as the focal point for coordinating regional response to requests from Headquarters and regional participation in national compliance assistance initiatives and the compliance assistance components of integrated compliance assurance strategies.

- **Coordinate with Lead Region and the Office of Compliance:** Coordinate with the Lead Region for compliance assistance, OC's Regional Analysis and Coordination Team, and OC's Compliance Assistance and Sector Programs Division on compliance assistance issues or activities that are or should be integrated with enforcement initiatives, involve potential resource tradeoffs, or need a coordinated response from OECA.

- **Planning and Integration:** Work with the Regional Enforcement and MOA Coordinators in developing and implementing national and regional compliance assistance priorities and strategies during the MOA process and other planning processes. Involve states in compliance assistance planning and priority setting. Ensure that regional activities related to MOA priorities are integrated into the annual Compliance Assistance Plan.

- **Compliance Assistance Plan and Clearinghouse Input:** Coordinate regional input into the National Compliance Assistance Clearinghouse and the Compliance Assistance Activity Plan.

- **Tool Wholesaling and Promotion:** Promote compliance assistance in regions, states, and tribes and provide compliance assistance tools and materials to compliance assistance providers and inspectors.

- **Policy Development:** Assist in the development of OC's compliance assistance policies and guidance.

- **Information Sharing:** Share lessons learned about compliance assistance activities and tools with other regions to maximize effectiveness of the compliance assistance program through monthly conference calls, periodic national meetings, and other vehicles.

- **Coordination with States, Tribes, and Other Providers:** Coordinate and share tools, information and best practices with state and tribal compliance assistance providers, Small

Business Assistance Providers, Small Business Development Committees, and other compliance assistance providers.

- **Tracking and Accountability:** Coordinate compliance assistance tracking and measurement activities within the Region, including coordinating regional input into the Regional Compliance Assistance Tracking System.

ATTACHMENT 2

FY 2002/2003 MOA Compliance Assistance Core Program

All Regional programs should:

- Utilize compliance assistance, as appropriate, to help ensure that the regulated community understands its regulatory obligations and how to comply with environmental requirements and track and measure the results of compliance assistance activities.

Compliance Assistance includes activities, tools or technical assistance which provide clear and consistent information for 1) helping the regulated community understand and meet its obligations under environmental regulations; or 2) compliance assistance providers to aid the regulated community in complying with environmental regulations. At least one objective of compliance assistance must be related to achieving or advancing regulatory compliance. Compliance assistance may also help the regulated community find cost-effective ways to comply with regulations and/or go "beyond compliance" through the use of pollution prevention, environmental management practices and innovative technologies, thus improving environmental performance. The core national compliance assistance program in the Regions consists of the following activities:

- Conducting workshops/training, making presentations at meetings, developing compliance assistance tools, distributing outreach material, conducting on-site visits, providing telephone/hotline assistance
- Focusing compliance assistance efforts on targeted environmental problems, as well as on new rules, SBREFA rules or economically significant rules targeting, in particular, small businesses and communities which often lack expertise to understand technical environmental regulations.
- Using compliance assistance in integrated enforcement strategies, as appropriate
- Contributing Regional projects to the annual Compliance Assistance Activity Plan
- Measuring the outputs of compliance assistance activities and outcomes of selected activities
- Reporting on compliance assistance activities in the Reporting Compliance Assistance Tracking System (RCATS)
- Serving predominantly as a "wholesaler" of compliance assistance to enable other assistance providers to offer assistance directly to the regulated community. "Retail" or direct assistance should be focused on non-delegated programs and national/Regional initiatives, as appropriate.
- Promoting national compliance assistance tools and activities such as the National Compliance Assistance Clearinghouse, the Compliance Assistance Centers and Compliance Assistance Forum
- Using compliance assistance materials in conjunction with the Small Business Compliance Policy and encouraging states to adopt EPA's 1995 Small

Communities Policy

- Coordinating with Headquarters, other EPA Regions and other compliance assistance providers, such as states, on compliance assistance needs and activities and enabling providers to leverage resources
- Holding an annual Regional stakeholder meeting(s) to obtain feedback on compliance assistance planning
- Assisting in compliance assistance targeting and data analysis, e.g., in selecting sectors that need assistance and developing compliance assistance materials

Regions should undertake these compliance assistance activities strategically, employing integrated planning and use of compliance assistance tools, as appropriate, tracking the results and measuring the effectiveness of compliance assistance activities. Inspectors providing Tier I or Tier II compliance assistance during compliance inspections in accordance with the recommendations of the Role of the EPA Inspector in Providing Compliance Assistance should refer to the Core Compliance Monitoring Program Activities section.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

March 19, 2003

MEMORANDUM

SUBJECT: Measuring Compliance Assistance Outcomes

FROM: Michael M. Stahl /s/
Director
Office of Compliance

TO: Regional Enforcement Division Directors
OC Division Directors
Regional Enforcement Coordinators

The purpose of this memorandum is to advance measurement of compliance assistance outcomes in the national enforcement and compliance assurance program. As you know, the proposed Goal 5 of the revised Agency Strategic Plan under the Government Performance and Results Act (GPRA) includes a variety of outcome measures for compliance assistance (see Attachment 1). Outcomes such as pollution reductions, improvements in facility environmental management practices, and increased understanding of environmental requirements will need to be measured for our compliance assistance activities when the new Strategic Plan goes into effect. In addition to accountability for meeting GPRA targets, the Assistant Administrator for Enforcement and Compliance Assurance is routinely using outcome data to examine the performance of the compliance assurance program. Over the last few years, we have made considerable progress in measuring the outputs and outcomes of compliance assistance activities. We are just now beginning to receive compliance assistance outcome information from the regions and need to build on this momentum.

Action Plan for Measuring Compliance Assistance Outcomes

Clearly, it is challenging to measure the outcomes of our assistance activities. We are working to build capacity, develop measurement "tools" and "templates" and standardize compliance assistance outcome reporting to help us achieve this goal. Our strategy will only be successful if compliance assistance measurement is routinely incorporated into the planning and implementation of our activities. We need to continue to track our compliance assistance activity outputs and strategically undertake outcome measurement.

In Fiscal Year 2003-2004, we need to collect and report data that will support our Goal 5 compliance assistance performance measures. As mentioned above, the three outcome measures are:

- increased understanding of environmental requirements;
- improved environmental management practices; and
- reduced pollution.

To enable us to meet this challenge, I'm asking that you undertake three actions that will help us increase the number of projects with outcome measurement components as well as generate better data to support our GPRA commitments. Beginning in 2003:

- compliance assistance activities that support the National OECA priorities or Regional priorities should measure outcomes using a follow-up method or activity (e.g., survey, post test, on-site revisit) (Attachment 2);

- compliance assistance workshops/training should include a pre-test/post-test to measure changes in understanding; and

- contract and grant activities involving compliance assistance (e.g. the integrated strategies funded through headquarters, the State compliance assistance projects funded through STAG grants) should include outcome measures as well. Contractors/grantees are accountable for providing these results to the Office of Compliance. Include the attached output/outcome measurement requirements language in all Requests for Proposals (RFPs) (Attachment 3). Contractor/grantee performance should be evaluated, in part, using agreed- upon measurement activities.

Office of Compliance Support for Regional GPRA Outcome Measurement Activities

To support your measurement activities, the Office of Compliance will:

1. Provide measurement training for all ten Regions and Headquarters in 2003. The training supplements the newly revised *Guide for Measuring Compliance Assistance Outcomes* ("the yellow book"), provides hands-on exercises for every section and addresses the proposed Goal 5 measures.

1. Continue to work with the Compliance Assistance Policy and Infrastructure (CAPI) Steering Committee to develop guidance on consistent measures, definitions and strategies to:
   a) implement the Goal 5 Compliance Assistance performance measures; b) develop compliance assistance program data standards; and c) develop other program measures to tell a clear and compelling story of the effectiveness of the compliance assistance program.

2. Provide support and guidance to contractors/grantees who must fulfill compliance assistance outcome measurement requirements.

3. Incorporate both RCATS and CAPD[1] into the Integrated Compliance Information System (ICIS) for FY 2004 to facilitate compliance assistance reporting for Goal 5 and beyond.

4. Continue to conduct monthly measurement calls (third Thursday in the month, 1:00 - 2:00 EST, 202-260-8330 1142#), to provide project support for compliance assistance measurement.

5. Support two measurement specific Web sites on the OECA Web page: http://www.epa.gov/compliance/planning/results and the National Environmental Compliance Assistance Clearinghouse http://cfpub.epa.gov/clearinghouse/index.cfm?TopicID=C:10:650. The sites have a collection of measurement resources in one place and we will continue to develop and post additional templates, surveys and other tools on these two sites as they come available.

Both Rochele Kadish in the Compliance Assistance and Sector Programs Division (CASPD) (564-3106) and Lynn Vendinello in the Enforcement Planning Targeting and Data Division (EPTDD) (564-7066) are available to help support your measurement efforts. Generally, Rochele will help you develop the measurement tool, discuss implementation, and analyze data whereas Lynn will help with your Information Collection Requests and getting the final data into RCATS/ICIS.

I look forward to seeing progress in our ability to report on and learn from measuring compliance assistance outcomes. If you have any questions please feel free to call me or contact Rochele or Lynn.

Attachments

cc: J.P. Suarez
Phyllis Harris
Deputy Regional Administrators
Lisa Lund
OC Deputy/Associate Division Directors
OC Branch Chiefs
Regional Compliance Assistance Coordinators
Rochele Kadish
Lynn Vendinello

[1]Reporting Compliance Assistance Tracking System & Compliance Assistance Planning Database

Attachment 1

GOAL 5 COMPLIANCE, PREVENTION, AND STEWARDSHIP

Improve environmental performance through compliance with environmental requirements preventing pollution, and promoting environmental stewardship. EPA and its partners will promote stewardship through incentives for governments, businesses, and the public to better protect human health and the environment.

OBJECTIVE 1: Maximize compliance to protect human health and the environment by achieving a X% increase in the pounds of pollution reduced through compliance assistance, compliance incentives, and enforcement by FY 2008; and achieving a X% increase by 2008, in the number of regulated entities making improvements in environmental management practices.

Subobjective 1.1: Prevent noncompliance and reduce environmental risks by achieving: a X% increase by 2008, in the percentage of regulated entities that improved their understanding of environmental requirements as a result of EPA assistance; a X% increase by 2008, in the number of regulated entities that improved environmental management practices as a result of EPA assistance; a X% by 2008, in the percentage of regulated entities that reduced pollution as a result of EPA compliance assistance.

Compliance Assistance [194.2 FTE and 5.1 M]

(Note: The principal measures listed with each sub-objective focus on outcomes. The other measures provide additional important information for understanding performance in meeting the subobjective. The numeric targets and the time periods are pending requiring further refinement and additional discussion with program management and staff.)

Principal Measures:

- **Percentage of regulated entities receiving direct compliance assistance (e.g., training, on-site visits, etc) from EPA reporting that they increased their understanding of environmental requirements as a result of EPA assistance.**

- **Percentage of regulated entities receiving direct compliance assistance (e.g, training, on-site visits, etc.) from EPA reporting that they improved environmental management practices as a result of EPA assistance.**

- **Percentage of regulated entities receiving direct assistance (e.g., training, on-site visits, etc.) from EPA reporting that they reduced pollution as a result of EPA assistance.**

- Percentage of regulated entities seeking assistance from EPA-sponsored compliance assistance centers reporting that they increased their understanding of environmental requirements as a result of their use of the centers or the clearinghouse.

- Percentage of regulated entities seeking assistance from EPA-sponsored compliance assistance centers reporting that they improved environmental management practices as a result of their use of the centers or the clearinghouse.

- Percentage of regulated entities seeking assistance from EPA-sponsored compliance assistance centers reporting that they reduced pollution as a result of their use of the centers or the clearinghouse.

Other Measures:

- Number of regulated entities seeking compliance assistance from EPA-sponsored centers or the EPA compliance assistance clearinghouse.

- Number of regulated entities reached through direct EPA or EPA-sponsored/funded compliance assistance.

- **Percentage of non-EPA assistance providers reporting improved ability to deliver compliance assistance as a result of using EPA compliance assistance tools and resources.**

- **Percentage of EPA or EPA- sponsored/funded compliance assistance projects undertaken as part of an integrated strategy or approach.**

Attachment 2

The table below shows the appropriate follow-up method for different compliance assistance activities and the outcome measures that can be gathered as a result. Through the use of checklists, pre-test / post tests and survey questions, we will be able to gather the data necessary to assess the outcomes of our activities. Some examples of questions that would help us to assess the outcomes of our activities include:

Increased Understanding

- Did your understanding of environmental regulations improve as a result the <compliance assistance activity>?

Improved environmental management practices

- What regulatory actions do you intend to take (did take) as a result of the <compliance assistance activity>?
- What process changes at your facility do you intend to make (did make) as a result of the <compliance assistance activity>?
- What management changes at your facility do you intend to take (did take) as a result of the <compliance assistance activity>?
- Who (if anyone) have you contacted (will contact) for further assistance as a result of the <compliance assistance activity>?

Reduced pollution – only for mail/phone surveys or on-site revisits

- Did you reduce pollution as a result of the Compliance Assistance information you received?

Compliance Assistance Activity	**Follow-up Methods**	**Outcome Measure**
Onsite Visits	On-site revisits	Reduction in Pollution Environmental Management Improvements Increased Understanding
	Phone/Mail/email survey	
Workshops / Training	On-site Pre/post test	Environmental Management Improvements Increased Understanding
	Phone/Mail/email survey	Reduced Pollution Environmental Management Improvements Increased Understanding
Tools (e.g., manuals)	Phone/Mail/email survey	Reduced Pollution Environmental Management Improvements Increased Understanding

Compliance Assistance Activity	Follow-up Methods	Outcome Measure
Web Sites	Online survey	Environmental Management Improvements Increased Understanding

Attachment 3

Measurement Language for Requests For Proposals:

Measurement Requirements:
1. Collect and make information available relating to the implementation of your project, your performance against your objectives and targets, and changes in compliance that occur as a result of the project.

Outputs (required)
- Activities undertaken
- Number of entities reached

Outcomes (one outcome measure is required)
- Increased understanding
- Improved environmental management practices
  - changes in regulatory behavior (e.g., getting a permit)
  - changes in non-regulatory behavior (e.g. implementing best management practices, process changes, self-audits)
  - changes in compliance
- Reduced pollution

DRAFT 5/1/08
Revised 4/29/11

Regional Plan for Region 8's Implementation of the State Review Framework (SRF), Uniform Enforcement Oversight System (UEOS) and Other Oversight Activities for the CWA NPDES, CAA Stationary Sources, RCRA Subtitle C, and Public Water System Supervision (PWSS) Enforcement Programs through FY 2012

Overview

The nature and scope of oversight activities and documentation of program assessments and reviews for state RCRA Subtitle C, NPDES, CAA Stationary Source, and Public Water System Supervision (PWSS) enforcement programs is dependent upon performance as documented during the previous year and, therefore, may vary from year to year. This differential oversight will range from minimum or baseline oversight for strong programs to SRF or UEOS program assessments every other year for those programs with ongoing significant problems. Each year, the results of activities and assessments/reviews that have occurred during the year will be documented by ECEJ in an end-of-year (EOY) report, State Review Framework (SRF) report, or, for the Public Water System Supervision (PWSS) enforcement program, a Uniform Enforcement Oversight System (UEOS) report. States will have an opportunity to review and comment on EOY reports and SRF/UEOS reports. Planned oversight activities for each year will be documented in a State Oversight Plan and provided to states. The following table provides some examples of how the level and frequency of various oversight activities are impacted by program performance.

Examples of Differential Oversight as a Function of Program Performance

Oversight Activity	Good Performance	Poor Performance
Periodic Comprehensive Review		
Frequency of SRF/UEOS review.	Once every four years	More frequent than every four years.
Annual/Ongoing Oversight		
Number of files reviewed during EOY review.	10 or less.	15 or less.
Areas for improvement tracked (as detailed, primarily, in SRF Tracker).	Few or none.	More.
Data Metrics review.	Limited review.	Targeted, more in depth review.
Frequency of routine, periodic program communications.	Quarterly to semi-annually.	Monthly to quarterly.

Program Assessment Using the OECA/ECOS SRF and UEOS

At least once every four years, state RCRA Subtitle C, NPDES, and CAA Stationary Source enforcement program performance will be evaluated using the OECA/ECOS SRF and associated

guidance. Likewise, PWSS enforcement program performance will continue to be evaluated using the UEOS and the frequency of reviews will be once every two to four years.

Program performance as determined by the most recent SRF or UEOS review will impact the frequency of program assessments using SRF or UEOS. The use of performance in determining review frequency is described in more detail below. Other factors impacting the schedule for SRF reviews for Round 2 (through FY 2012) include the need to spread the workload out over the four year cycle, the size of the state programs, and travel considerations. The schedule for the SRF reviews for Round 2 is attached. Each state's next PWSS enforcement program review using UEOS is planned for FY 2012.

The SRF is based on Region 8's UEOS and was developed jointly by the EPA Office of Enforcement and Compliance Assurance (OECA), all ten EPA Regions, the Environmental Council of States (ECOS) Compliance Committee and state representatives from each of the ten EPA regions. The SRF was developed as a tool to assess state enforcement and compliance assurance program performance and to provide a mechanism for EPA regions, working collaboratively with their states, to ensure that states meet agreed upon performance levels. Additional information regarding the SRF can be found at: http://www.epa-otis.gov/otis/stateframework.html

Like the Round 1 SRF reviews, the Round 2 reviews will include reviews of all three programs in a state at the same time. This will minimize the burden on the states, the Region, and OECA by maximizing the efficiency of the review process (e.g. cross-program kick-off and close out meetings, cross-program process communications, report review, etc.) and will result in a more timely cross-program summary of findings.

Annual Program Review

Oversight activities occurring during years in which SRF or UEOS reviews are not planned will range from a minimum or baseline level of oversight to a more enhanced level of oversight (including targeted oversight activities) as described in the table below. Should annual oversight activities demonstrate that program performance has either significantly improved or declined since the last annual review, then the planned oversight for the next year will be adjusted accordingly.

For PWSS, Region 8 also conducts annual on-site (audit) visits with each state to review the effectiveness of the state enforcement programs, as resources allow. These visits are conducted between November and February, and some of the information gathered is used for the UEOS evaluation. Region 8 staff review the files of specific public water systems and evaluate whether the state addressed each priority system in a timely manner and whether the state followed its enforcement escalation policy. In addition, Region 8 staff review the files of specific public water systems and evaluate how the state has responded to violations and the accuracy of data contained in state and federal databases. A report documenting the findings of the visit is issued to the state. As a part of the review, Region 8 identifies corrective actions that the state should implement to improve its enforcement program, and such actions may be incorporated into the PPA along with UEOS findings.

Program Performance and Differential Oversight

Performance Status	Resultant Oversight
Program standards are met (may have small problems in some areas) for all programs.	SRF every four years (UEOS for PWSS program). Minimum / baseline oversight activities during "off" years.
Program standards are generally met, however, some areas for improvement have been identified for some programs.	SRF potentially more frequent than every four years (UEOS for PWSS program). Baseline plus targeted oversight activities during "off" years.
For any program, program standards are generally not met, or, there are significant deficiencies in key areas.	SRF potentially more frequent than every four years. Baseline plus targeted oversight activities during "off" years. Additional escalating actions if progress is not made to correct problem areas.

Baseline oversight activities to occur every year *will* include:

- Review and documentation (through ECEJ End of Year Report) of progress towards meeting grant commitments,
- Routine communications and information sharing with state (to discuss, for example, HPVs, SNC, QNCR, etc.). For example, the frequency of periodic conference calls with the state may range from quarterly to semi-annually.
- Watch List review and follow-up,
- Limited Data Metrics review (focusing on significant changes in performance and on areas of concern from previous reviews),
- Limited after-the-fact review of state enforcement, inspection, and related files. These reviews may occur either on-site (in the state's offices) or off-site (at EPA's offices). The number of facility files to be reviewed for each program will be no more than ten. The process used for the selection of files to be reviewed will be consistent with the SRF file selection protocol (i.e. random and representative).
- Follow-up on open action items/recommendations from previous reviews (including those identified in the SRF Tracker).
- Other oversight activities required by national program guidance (e.g. oversight inspections, etc.).

Targeted oversight activities *may* also include (in addition to baseline activities):

- Targeted program improvement plans to be incorporated into PPAs.
- More frequent communications and information sharing with state. For example, the frequency range for periodic conference calls with the state may be increased to monthly.
- Increased number of oversight inspections.
- If data problems identified, targeted, more in depth data metrics review.
- Additional, targeted, after-the-fact and real time review of state files. The number of facility files to be reviewed after-the-fact for each program may increase to no more than 15. These files will include files targeted for review to focus on problem areas identified in addition to the random and representative files selected. Additionally, a number of targeted, real-time file reviews may also be conducted.

Documentation of Oversight Activities

End of Year Reports will be completed annually for all programs. For those years in which SRF reports (or UEOS for PWSS) are completed, they will serve the purpose of the EOY report. EOY reviews and documentation through the EOY Reports may utilize applicable portions of the SRF or UEOS guidance (*e.g.* review metrics), as appropriate. At a minimum, End of Year reports will incorporate the results of the minimum/baseline activities described above and the scope will address the following review areas: 1) inspections, 2) enforcement activity, 3) annual agreements, and 4) data management.

Specific oversight activities planned and actions planned to address any areas for improvement will be described in the final SRF or UEOS report, the State Oversight Plan, and incorporated by reference into the next PPA, as appropriate.

Review Schedule

While oversight and program review and assessment activities occur throughout the year, formal documentation of results doesn't begin until after data are available for the year under review and state EOY reports have been received. This is generally the middle of February following the year under review.

Draft documentation of annual program assessments/review will be completed by the end of April of the year after fiscal year reviewed. This is to allow findings and any corrective actions to be incorporated into the PPA negotiation process for the following fiscal year. The SRF guidance includes a comprehensive process for developing the report which includes many opportunities for findings to be discussed with states and for states to review and comment on draft reports prior to finalization. Final SRF reports will be completed by the end of the fiscal year following the fiscal year reviewed.

EOY reports documenting oversight activities and review results (for years in which an SRF/UEOS assessment is not conducted) will be finalized by the end of April following the fiscal year under review. Below is a summary of the state planning and oversight cycles and the schedule for the Round 2 SRF reviews.

Summary Region 8 State Planning and Oversight Cycles for Enforcement

May 1

- Final UEOS report (if applicable) provided to state.
- If no SRF (or UEOS for PWSS), final EPA End of Year report provided to state.
- PPA Guidance for next fiscal year provided to states.
- Draft Oversight Plans for next fiscal year provided to states.

July

- Draft SRF report (if applicable) provided to state for review.

May – August

- State Director's Meeting and State Visits (kick-off planning for next FY including plans for oversight).

Sept 30

- SRF report (if applicable) is finalized and provided to state.
- Final Oversight Plans for next fiscal year provided to states.
- PPAs in place.

Dec 31

- State End of Year Reports received from states.

February

- Data for prior fiscal year available in OTIS and SRF Data Metric Reports.

Schedule for Round 2 SRF Reviews

This schedule is based on several considerations including program performance as determined by the FY 07 SRF review, the need to spread the workload out over the four year cycle, the size of the state programs, and travel considerations. Significant changes in program performance observed throughout cycle may result in change to review schedule. Specifically, program performance was considered as follows:

- States with one or more programs that don't meet standards or in which significant deficiencies are identified are reviewed first.
- States in which all three programs reviewed have areas of improvement/Tracker items identified are generally reviewed prior to states in which one or more programs do not have areas of improvement/Tracker items identified.
- States with more total areas of improvement/Tracker items identified are generally reviewed prior to states with fewer areas of improvement/Tracker items.
- Other considerations include the need to spread the workload out over the four year cycle, the size of the state programs, and travel considerations.

Schedule for SRF Round 2

FY 2007
Round 1 comprehensive SRF review completed in all six states and in all 3 programs (18 programs overall)

FY 2008
No comprehensive SRF reviews. Scope of annual oversight (i.e. baseline/targeted) for all states/programs is dependent upon performance as determined during the Round 1 SRF review completed in FY 2007 and was described in the final SRF reports.

FY 2009	
State A	Round 2 comprehensive SRF Review for all 3 programs
State B	Round 2 comprehensive SRF Review for all 3 programs
Scope of annual oversight (i.e. baseline/targeted) for other states/programs will be dependent upon performance determined in previous FY and described in the State Oversight Plan for each state.	

FY 2010	
State C	Round 2 comprehensive SRF Review for all 3 programs
State D	Round 2 comprehensive SRF Review for all 3 programs
Scope of annual oversight (i.e. baseline/targeted) for other states/programs will be dependent upon performance determined in previous FY and described in the State Oversight Plan for each state.	

FY 2011	
State E	Round 2 comprehensive SRF Review for all 3 programs
Scope of annual oversight (i.e. baseline/targeted) for other states/programs will be dependent upon performance determined in previous FY and described in the State Oversight Plan for each state.	

FY 2012	
State F	Round 2 comprehensive SRF Review for all 3 programs
Scope of annual oversight (i.e. baseline/targeted) for other states/programs will be dependent upon performance determined in previous FY and described in the State Oversight Plan for each state.	

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OCT 31 1985

OFFICE OF WATER

MEMORANDUM

SUBJECT: Permit Compliance System (PCS) Policy Statement

FROM: Lawrence J. Jensen
Assistant Administrator for Water (WH-556)

TO: Regional Water Management Division Directors
Regions I - X

I am pleased to issue the attached policy statement on the Permit Compliance System (PCS). This policy statement represents an important step in the continuing effort to support a reliable and effective automated information system for the National Pollutant Discharge Elimination System (NPDES) program.

PCS is the national data base for the NPDES program. It serves as the primary source of NPDES information for EPA, NPDES States, Congress, and the public. The use and support of PCS by EPA Regions and NPDES States are crucial to the effectiveness and proper oversight of the NPDES program. This policy statement establishes for EPA and NPDES States the key management practices and responsibilities central to PCS' ability to contribute to the overall integrity of the NPDES program and the achievement of our long-term environmental goals. One of the requirements is to have Regions and States enter all required data into PCS by September 30, 1986 (see Attachment 1 of the PCS Policy Statement). While the aim of the policy is a consistent approach across Regional and State NPDES programs, it retains flexibility for Regions and States to tailor agreements to the unique conditions of each State.

The PCS Policy Statement is effective immediately. The Office of Water Enforcement and Permits will monitor implementation of the policy statement and issue special instructions as necessary. Regional Water Management Division Directors and their State counterparts are responsible for ensuring that their staffs receive sufficient support to apply the principles of the policy to their PCS activities.

I look forward to a strong commitment to this policy statement by EPA and State NPDES programs. You can be assured of my full support as EPA and the States move forward with its implementation.

Attachments

cc: Administrator
Deputy Administrator
State Directors
PCS Steering Committee
PCS Users Group

PERMIT COMPLIANCE SYSTEM POLICY STATEMENT
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

STATEMENT OF POLICY

It is EPA policy that the Permit Compliance System (PCS) shall be the national data base for the National Pollutant Discharge Elimination System (NPDES) program. All EPA Regions must use PCS directly, and all NPDES States must either use PCS directly or develop and maintain an interface.

As our primary data source, PCS will promote national consistency and uniformity in permit and compliance evaluation. To achieve national consistency and uniformity in the NPDES program, the required data in PCS must be complete and accurate. Facility, permits (i.e., events and limits), measurement, inspection, compliance schedule, and enforcement action data are required. These required data elements are further defined in Attachments 1 and 2. They comprise the Water Enforcement National Data Base (WENDB) which has been redefined as the core of information necessary to enable PCS to function as a useful operational and management tool and so that PCS can be used to conduct oversight of the effectiveness of the NPDES program.

All required data for NPDES and non-NPDES States must be entered into PCS by September 30, 1986 and maintained regularly thereafter. This will require Regions and States to start entering data as early as possible, and not wait until late FY 1986.

By the end of FY 1986, direct users of PCS shall establish, with Office of Water Enforcement and Permits (OWEP) assistance, a Quality Assurance program for data in PCS. The program shall define:

- monthly measurement of the level of data entered;
- appropriate time frames to ensure that data are entered in PCS in a timely manner; and
- nationally consistent standards of known data quality based on proven statistical methods of quality assurance. PCS Quality Assurance shall address the completeness (for assurance of full data entry) and accuracy of the data entered into PCS.

Adoption of PCS by States should be formalized in each State's §106 Program Plan, State/EPA Agreement, or in a separate agreement. Each plan should clearly define EPA's and the NPDES State's responsibilities regarding PCS. The Key Management Practices in this Policy Statement should be incorporated into the §106 Program Plan.

BACKGROUND

When the PCS Steering Committee met in March 1985, EPA Regional representatives stressed the essential need for a positive statement from EPA Headquarters management to Regional and State management specifically requiring the support and use of PCS. Lack of such support may result in an incomplete and unreliable data base. With sufficient EPA Headquarters, Regional, and State support, however, PCS will come to serve several major purposes for the NPDES program:

- PCS will provide the overall inventory for the NPDES program.
- PCS will provide data for responding to Congress and the public on the overall status of the NPDES program. As such, it will serve as a valuable tool for evaluating the effectiveness of the program and the need for any major policy changes.
- PCS will encourage a proper EPA/State oversight role by identifying all major permittee violators.
- PCS will offer all levels of government an operational and management tool for tracking permit issuance, compliance, and enforcement actions.

This PCS Policy Statement is a result of the Steering Committee meeting. It is a clear message to Regional and State management that PCS is the primary source of NPDES information, and as such, it is to be supported wholeheartedly by all users of PCS.

The PCS Steering Committee meeting also resulted in a redefinition of WENDB and ratification thereof. WENDB is the minimum standard of data entry which will allow PCS to function as a useful operational and management tool (see Attachments 1 and 2). EPA Regions agreed that all WENDB elements will be entered into PCS by September 30, 1986, and maintained regularly thereafter.

Once the required data are entered into and regularly maintained in PCS, PCS will assist permits and compliance personnel in many of their operational and management responsibilities. PCS will greatly reduce reporting burdens for such activities as the Strategic Planning and Management System (SPMS), and it will reduce efforts needed for effective compliance tracking at both Regional and State levels. Also, substantial automation of the Quarterly Noncompliance Report (QNCR) will save time and resources.

IMPLEMENTATION STRATEGY

Key Management Practices

To effectively implement and uphold this PCS Policy Statement and enhance PCS' capabilities, there are certain key management practices that must be implemented:

- The following milestones have been established to facilitate the entry of all required data by the end of FY 1986:

  - All required National Municipal Policy (NMP) data must be entered into PCS by October 31, 1985 (See Attachment 1).

  - All required data for non-NPDES States must be entered into PCS by March 31, 1986.

- NPDES permits shall be enforceable and tracked for compliance using PCS. The Office of Water Enforcement and Permits (OWEP) recognizes there may be situations where permit limits and monitoring conditions are not initially compatible with PCS data entry and tracking. In these cases, Regions should ensure that appropriate steps are taken by the permit writer to identify difficult permits to the PCS coder, and to mutually resolve any coding issues. The Regions should work closely with their NPDES States using PCS, to address similar data entry problems with State-issued NPDES permits.

- WENDB is the minimum standard of data entry for PCS (see the attached lists of data requirements). If States and Regions wish to enter NPDES data beyond what has been required, they may do so. For example, if States want to enter Discharge Monitoring Report (DMR) data for minor facilities, the option is available in PCS and the States' may use it as their resources allow. EPA will ensure that sufficient computer space is available for the currently projected use of PCS.

- All DMRs submitted to EPA Regional Offices (including DMRs submitted by NPDES States for EPA entry into PCS) must be preprinted using the Office of Management and Budget (OMB) approved DMR form. NPDES States directly using PCS are not required to use the OMB-approved form; however, its use is strongly encouraged. With the continuing demand for more complete information and with stable, if not diminishing, data entry resources, it is to EPA's and NPDES States' benefit to preprint DMRs. The use of preprinted DMRs will greatly reduce PCS' data entry burden, making available resources to be used in other areas (e.g., PCS quality assurance, data entry for other PCS records, etc.).

- The frequency with which DMRs are submitted to the EPA or NPDES State is important for ensuring timely entry of data into PCS and timely review of permittee's compliance status. Quarterly, semi-annual, or annual submission of DMRs creates a major data entry burden and impedes the compliance evaluation process. As a result, the usefulness of DMR data for compliance evaluation decreases substantially. Monthly submittal of DMRs alleviates this problem and enhances PCS' effectiveness significantly. It is recommended that monthly submittal of DMRs be incorporated into major permits as they are reissued. With approximately 20 percent of the permits reissued each year, it will take five years to complete the transition to monthly submittal for all major permittees.

- EPA Regions should coordinate with their respective States to develop strategies that describe each State's plans to either use PCS directly or develop an interface. These strategies should include the rationale for selecting one of these methods of data entry into PCS, an outline of all requirements necessary for implementing the selected method, the mechanisms to be used to supply sufficient resources, and a schedule for attainment not to exceed September 30, 1986. If a State is a current user of PCS via one of these methods, the strategy should describe its needs for enhancing its PCS usage or improving its PCS interface, the mechanisms to be used to supply sufficient resources, and a schedule for attainment not to exceed September 30, 1986.

- When writing or revising a Memorandum of Agreement (MOA), the Region and State should specify the State's intent to use or interface with PCS. The MOA should address the rationale for selecting one of these selected methods of data entry into PCS, an outline of all requirements necessary for implementing the selected method, the mechanisms to be used to supply sufficient resources, and a schedule for attainment.

Responsibilities

Office of Water Enforcement and Permits: It is OWEP's full responsibility to maintain the structure (i.e., the computer software) of PCS and to operate the system. OWEP will continue to support time-sharing funds needs, training, and the necessary resources to continue the operation of PCS. OWEP will work with the EPA Regions and NPDES States to continually evaluate and improve, where feasible, the system's software, time-share funding, operation, and maintenance. OWEP will maintain a Steering Committee and User Group, organize the national meetings, and work closely with the Regional and State representatives on major decisions related to PCS.

OWEP will oversee the Regions' and States' progress in fulfilling this policy statement by assessing the quantity of data entered each quarter.

EPA Regions and NPDES States: It is the EPA Regions' and NPDES States' full responsibility to maintain the infrastructure of PCS by accurately entering data in a timely manner. Also, EPA Regions and NPDES States are responsible for participating in PCS Workgroups and contributing to improvements to PCS.

Three National PCS meetings are held each year, one for the Steering Committee and two for the PCS Users Group. EPA Regions are expected to attend all three meetings. NPDES States directly using PCS are invited to attend the State portions of these meetings. More meetings may be scheduled during the year if necessary.

Since consistent and objective compliance tracking is a central component of an effective and credible enforcement program, NPDES States are strongly urged to use PCS directly. We realize, however, that there may be some cases where NPDES States cannot use PCS directly. In these instances, in accordance with §123.41 of the regulations, EPA requests from the States all required information (as indicated in the attachments) for entry into PCS. This can be achieved one of two ways:

- A State Automated Data Processing (ADP) interface can be developed. It is the EPA Region's responsibility to work with the NPDES State to develop an effective State ADP interface. The State, however, should take the lead in developing the interface and work closely with the Region to ensure the interface is effective. It should be realized that system interfaces are often troublesome and unwieldy; they are often ineffective and limit the States' flexibility to change their systems quickly to meet management needs. In the event a State ADP interface is developed, there must be formal agreement that the State will operate the interface, maintain the interface software, and be fully responsible for making any changes to the interface based on changes made to its automated data base. This will ensure that the NPDES State will be held responsible for system compatibility. If the State does not accept full responsibility with system compatibility, then changes must not be made to the State system without the prior knowledge of EPA. The State is responsible for ensuring that the data are transferred to PCS in a timely manner, accurately, and completely. Interfaces must be developed and maintained so that they operate with maximum efficiency all of the time.

- OWEP recognizes that FY 1986 will be a transition year for PCS. NPDES States will begin using PCS or will develop interfaces. In the event that neither of these alternatives is accomplished by the end of FY 1986, in accordance with the FY 1986 Guidance for the Oversight of NPDES Programs, the State will be responsible for submitting all required information (as indicated in the attachments) in hard copy format. The data must be submitted either already

coded onto PCS coding sheets or in a format that can be readily transferred onto PCS coding sheets. Also, the data must be submitted at regular intervals to ensure timely entry into PCS. Once the data are received by EPA, it is the EPA Region's responsibility to enter the data into PCS in a timely manner.

Funding

- §106 grant funds may be used for interface software development. However, they cannot be used for maintenance of the interface software for State-initiated changes to a State ADP system or for the operation and maintenance of a separate State ADP system.

- §106 grant funds may be used for State data entry if and only if the State uses PCS directly or the State provides data to PCS via an interface that meets the standards of this policy.

- If requested by a State, EPA will agree to pay for its time-sharing costs to implement this policy, within given resources.

- Headquarters will continue to pursue alternative methods of reducing the data entry burden on Regions and States.

10/31/85
Date

Lawrence J. Jensen
Assistant Administrator for Water

ATTACHMENT 1

REQUIRED DATA TO BE ENTERED INTO PCS

Information Type[1]	Majors	Minor 92-500s	Other Minors
Permit Facility Data	X	X	X
Permit Event Data	X	X	X
Inspection Data	X	X	X
Parameter Limits and Pipe Schedule Data	X		
Compliance Schedule Data	X	X	
DMR Measurement Data	X		
Significant Noncompliance Flag		X	
Enforcement Action Data (Enforcement Action Data, Compliance Schedule Data, and Interim Limits Data from all active formal enforcement actions)	X		
Enforcement Action Data (Type Action, ENAC; Issue Date, ENDT; and Date Compliance Required, ERDT; from all active formal enforcement actions)		X	
Pretreatment Approval[2]	X	X	X
National Municipal Policy Data[3]	X	X	X

[1]For each of the categories listed in this chart, the Information Type is the set of core data elements listed in Attachment 2.

[2]Pretreatment Program Required Indicator, PRET; one data element.

[3]All required data as described in May 16, 1985 memorandum on National Municipal Policy Tracking in PCS. This includes Facility User Data Element 6 (RDF6), Compliance Schedule and Enforcement Action information.

ATTACHMENT 2

WATER ENFORCEMENT NATIONAL DATA BASE (WENDB) ELEMENTS

Data Element Name	Acronym
COMMON KEY	
NPDES Number	NPID
COMPLIANCE SCHEDULE RECORD	
Compliance Schedule Number	CSCH
Data Source Code	DSCD
Compliance Actual Date	DTAC
Compliance Report Received Date	DTRC
Compliance Schedule Date	DTSC
Compliance Schedule Event Code	EVNT
COMPLIANCE VIOLATION RECORD	
*Compliance Violation Date	CVDT
*Violation Compliance Event Code	CVEV
*Compliance Violation Code	CVIO
*Significant Non-Compliance Code (Compliance)	SNCC
*Significant Non-Compliance Date (Compliance)	SNDC
*Violation Compliance Schedule Number	VCSN
*Violation Data Source Code	VDCD
ENFORCEMENT ACTION RECORD	
Enforcement Action Response Achieved Date	EADR
Enforcement Action Comment Line 1	ECM1
Enforcement Action Comment Line 2	ECM2
Enforcement Action Comment Line 3	ECM3
Enforcement Action Comment Line 4	ECM4
Enforcement Action Comment Line 5	ECM5
Enforcement Action Compliance Violation Code	ECVC
Enforcement Action Compliance Violation Date	ECVD
Enforcement Action Modification Number	EMOD
Enforcement Action Code	ENAC
Enforcement Action Date	ENDT
Enforcement Action Status Code	ENST
Enforcement Action Response Due Date	ERDT
Enforcement Action Status Date	ESDT
Enforcement Action Season Number	ESEA
Enforcement Action Source Code	EVCD
Enforcement Action Discharge Number	EVDS

* Usually generated by PCS; can be manually entered.

WENDB ELEMENTS
(Continued)

Data Element Name	Acronym
Enforcement Action Event Code	EVEV
Enforcement Action Limit Type-Alphabetic	EVLM
Enforcement Action Monitoring Date	EVMD
Enforcement Action Monitoring Location	EVML
Enforcement Action STORET Parameter Code	EVPR
Enforcement Action Discharge Designator	EVRD
Enforcement Action Compliance Schedule	EVSN
Enforcement Action Violation Type	EVTP
EVIDENTIARY HEARING RECORD	
Evidentiary Hearing Event Date	EHDT
Evidentiary Hearing Event Code	EHEV
INSPECTION RECORD	
Inspection Date	DTIN
Inspector Code	INSP
Inspection Type	TYPI
MEASUREMENT VIOLATION RECORD	
Measurement Concentration Average	MCAV
Measurement Concentration Minimum	MCMN
Measurement Concentration Maximum	MCMX
Measurement Quantity Average	MQAV
Measurement Quantity Maximum	MQMX
Violation Date (Measurement)	MVDT
No Discharge Indicator	NODI
*Significant Non-Compliance Code (Measurement)	SNCE
*Significant Non-Compliance Date (Measurement)	SNDE
Violation Measurement Designator	VDRD
Measurement Discharge Number	VDSC
Violation Monitoring Location	VMLO
Violation STORET Parameter	VPRM
PARAMETER LIMITS RECORD	
Change of Limit Status	COLS
Contested Parameter Indicator	CONP
Modification Period End Date	ELED
Modification Period Start Date	ELSD
Concentration Average Limit	LCAV
Concentration Minimum Limit	LCMN
Concentration Maximum Limit	LCMX
Concentration Unit Code	LCUC
Quantity Average Limit	LQAV

WENDB ELEMENTS
(Continued)

Data Element Name	Acronym
Quantity Maximum Limit	LQMX
Quantity Unit Code	LQUC
Limit Type - Alphabetic	LTYP
Monitoring Location	MLOC
Modification Number	MODN
Limit Discharge Number	PLDS
Limit Report Designator	PLRD
STORET Parameter Code	PRAM
Season Number	SEAN
Statistical Base Code	STAT
PERMIT EVENT RECORD	
Permit Tracking Actual Date	PTAC
Permit Tracking Event Code	PTEV
PERMIT FACILITY RECORD	
River Basin	BAS6
City Code	CITY
County Code	CNTY
Type Permit Issued - EPA/State	EPST
Federal Grant Indicator	FDGR
Final Limits Indicator	FLIM
Average Design Flow	FLOW
Facility Name Long	FNML
Facility Inactive Code	IACC
Major Discharge Indicator (Entered by EPA Headquarters)	MADI
Pretreatment Program Required Indicator	PRET
SIC Code	SIC2
Type Ownership	TYPO
National Municipal Policy Tracking Indicator	RDF6
Significant Noncompliance Flag for P.L. 92-500 Minor Facilities	(To Be Created)
PIPE SCHEDULE RECORD	
Report Designator	DRID
Discharge Number	DSCH
Final Limits End Date	FLED
Final Limits Start Date	FLSD
Interim Limits End Date	MLED
Interim Limits Start Date	MLSD
Initial Limits End Date	ILED
Initial Limits Start Date	ILSD
Number of Units in Report Period	NRPU
Number of Units in Submission Period - EPA	NSUN
Number of Units in Submission Period - State	NSUS

WENDB ELEMENTS
(Continued)

Data Element Name	Acronym
Pipe Inactive Code	PIAC
Report Units	REUN
Initial Report Date	STRP
Initial Submission Date - State	STSS
Initial Submission Date - EPA	STSU
Submission Unit - EPA	SUUN
Submission Unit - State	SUUS

NOTE: Additional data elements subject to approval:

Frequency of Analysis	FRAN
Sample Type	SAMP
Compliance Schedule File Number	CSFN
Enforcement Action File Number	ERFN
Permit Limits File Number	LSFN
Inspection Comments (First Three Characters for the Number of Industrial Users Inspected)	ICOM
Facility Inactive Date	IADD
Reissuance Control Indicator	RCIN
Pipe Inactive Date	PIDT

Total:	111	WENDB elements
plus additional data elements:	+ 9	data elements
New total:	120	WENDB elements

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

DEC 2 8 2007

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

Subject: ICIS Addendum to the Appendix of the 1985 Permit Compliance System Policy Statement

From: Michael M. Stahl, Director
Office of Compliance
Office of Enforcement and Compliance Assurance

James A. Hanlon, Director
Office of Wastewater Management
Office of Water

To: Regional Water Division Directors, Regions 1-10

On October 31, 1985, EPA issued the Permit Compliance System (PCS) Policy Statement. Since then, the PCS Policy Statement has been updated numerous times, including the most recent update in 2000. As of August 2006, 21 states, 2 Tribes and 9 territories have been entering their Clean Water Act National Pollutant Discharge Elimination System (NPDES) data into the modernized PCS, the Integrated Compliance Information System for NPDES (ICIS-NPDES). ICIS was designed to incorporate new technology and the full scope of the NPDES program as it has evolved since 1985. This Addendum to the PCS Policy Statement provides an interim approach for ensuring consistency in national NPDES program information during the transition from PCS to ICIS-NPDES.

The PCS Policy Statement defined a list of data elements, known as the Water Enforcement National Data Base (WENDB), required to be entered into PCS. This Addendum specifies the data elements (Attachment 1) in ICIS-NPDES that are comparable to WENDB. Attachment 1 lists the minimum data that the states, territories, tribes and EPA Regions using ICIS-NPDES should currently be entering into ICIS.[1]

The ICIS-NPDES data elements listed in Attachment 1 align as closely as possible to the universes that are relevant to WENDB as specified in the PCS Policy Statement.

[1] ICIS-NPDES was designed to help states, territories, tribes and EPA Regions implement and manage the NPDES program in their jurisdictions. Thus, ICIS-NPDES contains many more data elements than the limited set identified in Attachment 1 for purposes of interim national reporting. We encourage our direct user states, territories, tribes and the EPA Regions to take advantage of the full functionality and breadth of the data elements in ICIS-NPDES.

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However, given the different system architecture between PCS and ICIS-NPDES, the ICIS-NPDES data elements listed in Attachment 1 do not correlate to every WENDB element. Some WENDB data elements do not translate to data elements in ICIS-NPDES; some were split apart into two data elements in ICIS-NPDES; some were combined in ICIS-NPDES; and a few were not included in ICIS-NPDES.

- For example, in PCS, a Concentrated Animal Feeding Operation (CAFO) permit could only be signified by a special character in the third digit of the permit number. ICIS-NPDES allows a CAFO permit to be identified as a unique permit component for a facility. However, when a particular permit component is identified in ICIS-NPDES, the system may require additional fields to be entered. In some situations, the additional data elements are required to save the permit component record, and in other cases, additional data elements may be required only when certain activities are performed for the record to be complete enough to save. In this case, once a facility is identified as having a CAFO permit component, three additional permit data elements associated with a CAFO are required by the system to save that entry. If a CAFO inspection occurs, one additional CAFO-related system-required data element must be entered before the rest of the inspection record will be saved by the data system.

Thus, translating WENDB from PCS to ICIS-NPDES is not a direct match. Overall, while WENDB has 220 data elements, this Addendum (Attachment 1) specifies only 187 data elements that should be entered into ICIS-NPDES during this interim period This Addendum is necessary to ensure national consistency in minimum data expectations while the Agency is managing the national NPDES program with both PCS and ICIS-NPDES. The Agency does not believe that the PCS Policy Statement, even with this Addendum, meets its national need for information to manage the NPDES program. Thus, the Agency is concurrently pursuing a rulemaking approach that will identify a full set of data elements that all implementing agencies of the NPDES program will be required to enter or otherwise flow to ICIS-NPDES.

The PCS Policy Statement, with this Addendum, continues to be in effect for all agencies authorized to implement the NPDES program. Agencies that are still using PCS will continue to follow WENDB, while agencies that have moved from PCS to ICIS will follow the minimum data elements specified in Attachment 1 to this Addendum. EPA expects all users of PCS and ICIS-NPDES to maintain the high standards of timeliness, completeness, and accuracy that have been expected in PCS.

If you have questions regarding this Addendum, you may contact Betsy Smidinger, Deputy Division Director, Enforcement Targeting and Data Division, at (202) 564-4017. The staff contact is Andy Hudock at (202) 564-6032

cc: ICIS-NPDES and PCS Coordinators in States and Regions
Expanded ICIS-NPDES/PCS Steering Committee

Attachment

(f) A public hearing held under paragraph (e) of this section shall be conducted by the Regional Administrator, and, at the Regional Administrator's discretion, with the assistance of an EPA panel designated by the Regional Administrator, in an orderly and expeditious manner.

(g) Following the public hearing, the Regional Administrator shall reaffirm the original objection, modify the terms of the objection, or withdraw the objection, and shall notify the State of this decision.

(h)(1) If no public hearing is held under paragraph (e) of this section and the State does not resubmit a permit revised to meet the Regional Administrator's objection within 90 days of receipt of the objection, the Regional Administrator may issue the permit in accordance with parts 121, 122 and 124 of this chapter and any other guidelines and requirements of CWA.

(2) If a public hearing is held under paragraph (e) of this section, the Regional Administrator does not withdraw the objection, and the State does not resubmit a permit revised to meet the Regional Administrator's objection or modified objection within 30 days of the date of the Regional Administrator's notification under paragraph (g) of this section, the Regional Administrator may issue the permit in accordance with parts 121, 122 and 124 of this chapter and any other guidelines and requirements of CWA.

(3) Exclusive authority to issue the permit passes to EPA when the times set out in this paragraph expire.

(i) [Reserved]

(j) The Regional Administrator may agree, in the Memorandum of Agreement under § 123.24 (or, in the case of a sewage sludge management program, § 501.14 of this chapter), to review draft permits rather than proposed permits. In such a case, a proposed permit need not be prepared by the State and transmitted to the Regional Administrator for review in accordance with this section unless the State proposes to issue a permit which differs from the draft permit reviewed by the Regional Administrator, the Regional Administrator has objected to the draft permit, or there is significant public comment.

[48 FR 14178, Apr. 1, 1983, as amended at 54 FR 18785, May 2, 1989; 54 FR 23896, June 2, 1989; 60 FR 15386, Mar. 23, 1995; 63 FR 45122, Aug. 24, 1998; 65 FR 30910, May 15, 2000]

§ 123.45 Noncompliance and program reporting by the Director.

The Director shall prepare quarterly, semi-annual, and annual reports as detailed below. When the State is the permit-issuing authority, the State Director shall submit all reports required under this section to the Regional Administrator, and the EPA Region in turn shall submit the State reports to EPA Headquarters. When EPA is the permit-issuing authority, the Regional Administrator shall submit all reports required under this section to EPA Headquarters.

(a) *Quarterly reports.* The Director shall submit quarterly narrative reports for major permittees as follows:

(1) *Format.* The report shall use the following format:

(i) Provide a separate list of major NPDES permittees which shall be subcategorized as non-POTWs, POTWs, and Federal permittees.

(ii) Alphabetize each list by permittee name. When two or more permittees have the same name, the permittee with the lowest permit number shall be entered first.

(iii) For each permittee on the list, include the following information in the following order:

(A) The name, location, and permit number.

(B) A brief description and date of each instance of noncompliance for which paragraph (a)(2) of this section requires reporting. Each listing shall indicate each specific provision of paragraph (a)(2) (e.g., (ii)(A) thru (iii)(G)) which describes the reason for reporting the violation on the quarterly report.

(C) The date(s), and a brief description of the action(s) taken by the Director to ensure compliance.

(D) The status of the instance(s) of noncompliance and the date noncompliance was resolved.

(E) Any details which tend to explain or mitigate the instance(s) of noncompliance.

(2) *Instances of noncompliance by major dischargers to be reported*—(i) *General.* Instances of noncompliance, as defined in paragraphs (a)(2)(ii) and (iii) of this section, by major dischargers shall be reported in successive reports until the noncompliance is reported as resolved (i.e., the permittee is no longer violating the permit conditions reported as noncompliance in the QNCR). Once an instance of noncompliance is reported as resolved in the QNCR, it need not appear in subsequent reports.

(A) All reported violations must be listed on the QNCR for the reporting period when the violation occurred, even if the violation is resolved during that reporting period.

(B) All permittees under current enforcement orders (i.e., administrative and judicial orders and consent decrees) for previous instances of noncompliance must be listed in the QNCR until the orders have been satisfied in full and the permittee is in compliance with permit conditions. If the permittee is in compliance with the enforcement order, but has not achieved full compliance with permit conditions, the compliance status shall be reported as ''resolved pending,'' but the permittee will continue to be listed on the QNCR.

(ii) *Category I noncompliance.* The following instances of noncompliance by major dischargers are Category I noncompliance:

(A) Violations of conditions in enforcement orders except compliance schedules and reports.

(B) Violations of compliance schedule milestones for starting construction, completing construction, and attaining final compliance by 90 days or more from the date of the milestone specified in an enforcement order or a permit.

(C) Violations of permit effluent limits that exceed the Appendix A ''Criteria for Noncompliance Reporting in the NPDES Program''.

(D) Failure to provide a compliance schedule report for final compliance or a monitoring report. This applies when the permittee has failed to submit a final compliance schedule progress report, pretreatment report, or a Discharge Monitoring Report within 30 days from the due date specified in an enforcement order or a permit.

(iii) *Category II noncompliance.* Category II noncompliance includes violations of permit conditions which the Agency believes to be of substantial concern and may not meet the Category I criteria. The following are instances of noncompliance which must be reported as Category II noncompliance unless the same violation meets the criteria for Category I noncompliance:

(A) (*1*) Violation of a permit limit;

(*2*) An unauthorized bypass;

(*3*) An unpermitted discharge; or

(*4*) A pass-through of pollutants which causes or has the potential to cause a water quality problem (e.g., fish kills, oil sheens) or health problems (e.g., beach closings, fishing bans, or other restrictions of beneficial uses).

(B) Failure of an approved POTW to implement its approved pretreatment program adequately including failure to enforce industrial pretreatment requirements on industrial users as required in the approved program.

(C) Violations of any compliance schedule milestones (except those milestones listed in paragraph (a)(2)(ii)(B) of this section) by 90 days or more from the date specified in an enforcement order or a permit.

(D) Failure of the permittee to provide reports (other than those reports listed in paragraph (a)(2)(ii)(D) of this section) within 30 days from the due date specified in an enforcement order or a permit.

(E) Instances when the required reports provided by the permittee are so deficient or incomplete as to cause misunderstanding by the Director and thus impede the review of the status of compliance.

(F) Violations of narrative requirements (e.g., requirements to develop Spill Prevention Control and Countermeasure Plans and requirements to implement Best Management Practices), which are of substantial concern to the regulatory agency.

(G) Any other violation or group of permit violations which the Director or Regional Administrator considers to be of substantial concern.

(b) *Semi-annual statistical summary report.* Summary information shall be

provided twice a year on the number of major permittees with two or more violations of the same monthly average permit limitation in a six month period, including those otherwise reported under paragraph (a) of this section. This report shall be submitted at the same time, according to the Federal fiscal year calendar, as the first and third quarter QNCRs.

(c) *Annual reports for NPDES*—(1) *Annual noncompliance report.* Statistical reports shall be submitted by the Director on nonmajor NPDES permittees indicating the total number reviewed, the number of noncomplying nonmajor permittees, the number of enforcement actions, and number of permit modifications extending compliance deadlines. The statistical information shall be organized to follow the types of noncompliance listed in paragraph (a) of this section.

(2) A separate list of nonmajor discharges which are one or more years behind in construction phases of the compliance schedule shall also be submitted in alphabetical order by name and permit number.

(d) *Schedule*—(1) *For all quarterly reports.* On the last working day of May, August, November, and February, the State Director shall submit to the Regional Administrator information concerning noncompliance with NPDES permit requirements by major dischargers in the State in acordance with the following schedule. The Regional Administrator shall prepare and submit information for EPA-issued permits to EPA Headquarters in accordance with the same schedule:

QUARTERS COVERED BY REPORTS ON NONCOMPLIANCE BY MAJOR DISCHARGERS:

[Date for completion of reports]

January, February, and March	[1] May 31
April, May, and June	[1] August 31
July, August, and September	[1] November 30
October, November, and December.	[1] February 28

[1] Reports must be made available to the public for inspection and copying on this date.

(2) *For all annual reports.* The period for annual reports shall be for the calendar year ending December 31, with reports completed and available to the public no more than 60 days later.

APPENDIX A TO §123.45—CRITERIA FOR NONCOMPLIANCE REPORTING IN THE NPDES PROGRAM

This appendix describes the criteria for reporting violations of NPDES permit effluent limits in the quarterly noncompliance report (QNCR) as specified under §123.45(a)(2)(ii)(c). Any violation of an NPDES permit is a violation of the Clean Water Act (CWA) for which the permittee is liable. An agency's decision as to what enforcement action, if any, should be taken in such cases, will be based on an analysis of facts and legal requirements.

Violations of Permit Effluent Limits

Cases in which violations of permit effluent limits must be reported depend upon the magnitude and/or frequency of the violation. Effluent violations should be evaluated on a parameter-by-parameter and outfall-by-outfall basis. The criteria for reporting effluent violations are as follows:

a. Reporting Criteria for Violations of Monthly Average Permit Limits—Magnitude and Frequency

Violations of monthly average effluent limits which exceed or equal the product of the Technical Review Criteria (TRC) times the effluent limit, and occur two months in a six month period must be reported. TRCs are for two groups of pollutants.

Group I Pollutants—TRC=1.4
Group II Pollutants—TRC=1.2

b. Reporting Criteria for Chronic Violations of Monthly Average Limits

Chronic violations must be reported in the QNCR if the monthly average permit limits are exceeded any four months in a six-month period. These criteria apply to all Group I and Group II pollutants.

GROUP I POLLUTANTS—TRC=1.4

Oxygen Demand

Biochemical Oxygen Demand
Chemical Oxygen Demand
Total Oxygen Demands
Total Organic Carbon
Other

Solids

Total Suspended Solids (Residues)
Total Dissolved Solids (Residues)
Other

Nutrients

Inorganic Phosphorus Compounds
Inorganic Nitrogen Compounds
Other

Detergents and Oils

MBAS

NTA
Oil and Grease
Other detergents or algicides

Minerals

Calcium
Chloride
Fluoride
Magnesium
Sodium
Potassium
Sulfur
Sulfate
Total Alkalinity
Total Hardness
Other Minerals

Metals

Aluminum
Cobalt
Iron
Vanadium

GROUP II POLLUTANTS—TRC=1.2

METALS (ALL FORMS)

Other metals not specifically listed under Group I

Inorganic

Cyanide
Total Residual Chlorine

Organics

All organics are Group II except those specifically listed under Group I.

(Approved by the Office of Management and Budget under control number 2040–0082)

[48 FR 14178, Apr. 1, 1983, as amended at 50 FR 34653, Aug. 26, 1985; 54 FR 18785, May 2, 1989; 63 FR 45123, Aug. 24, 1998]

§ 123.46 Individual control strategies.

(a) Not later than February 4, 1989, each State shall submit to the Regional Administrator for review, approval, and implementation an individual control strategy for each point source identified by the State pursuant to section 304(l)(1)(C) of the Act which discharges to a water identified by the State pursuant to section 304(l)(1)(B) which will produce a reduction in the discharge of toxic pollutants from the point sources identified under section 304(l)(1)(C) through the establishment of effluent limitations under section 402 of the CWA and water quality standards under section 303(c)(2)(B) of the CWA, which reduction is sufficient, in combination with existing controls on point and nonpoint sources of pollution, to achieve the applicable water quality standard as soon as possible, but not later than three years after the date of establishment of such strategy.

(b) The Administrator shall approve or disapprove the control strategies submitted by any State pursuant to paragraph (a) of this section, not later than June 4, 1989. If a State fails to submit control strategies in accordance with paragraph (a) of this section or the Administrator does not approve the control strategies submitted by such State in accordance with paragraph (a), then, not later than June 4, 1990, the Administrator in cooperation with such State and after notice and opportunity for public comment, shall implement the requirements of CWA section 304(l)(1) in such State. In the implementation of such requirements, the Administrator shall, at a minimum, consider for listing under CWA section 304(l)(1) any navigable waters for which any person submits a petition to the Administrator for listing not later than October 1, 1989.

(c) For the purposes of this section the term individual control strategy, as set forth in section 304(l) of the CWA, means a final NPDES permit with supporting documentation showing that effluent limits are consistent with an approved wasteload allocation, or other documentation which shows that applicable water quality standards will be met not later than three years after the individual control strategy is established. Where a State is unable to issue a final permit on or before February 4, 1989, an individual control strategy may be a draft permit with an attached schedule (provided the State meets the schedule for issuing the final permit) indicating that the permit will be issued on or before February 4, 1990. If a point source is subject to section 304(l)(1)(C) of the CWA and is also subject to an on-site response action under sections 104 or 106 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), (42 U.S.C. 9601 *et seq.*), an individual control strategy may be the decision document (which incorporates the applicable or relevant and appropriate requirements under the CWA) prepared under sections 104 or 106 of CERCLA to address the release or

ICIS-NPDES Policy Statement

DRAFT

U.S. Environmental Protection Agency

April 30, 2007

ICIS-NPDES Policy Statement

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A. Introduction

The U.S. Environmental Protection Agency (EPA) has the primary responsibility to ensure that the Clean Water Act's (CWA) National Pollutant Discharge Elimination System (NPDES) program is effectively and consistently implemented across the country. In order for EPA to manage the NPDES national program, EPA needs ready access to information on the facilities that are regulated by the NPDES program. Some of EPA's national NPDES information needs are described below:

- Timely access to facility-specific permit, discharge, compliance and enforcement information in a nationally consistent format is critical for EPA to 1) develop effective regulations, such as national effluent guidelines for specific industrial sectors, 2) identify non-compliance problems, trends, and their associated environmental impacts on both an intra-state and inter-state basis, and 3) develop effective national strategies for improving compliance and environmental protection.

- EPA needs information to demonstrate results achieved by effectively using resources to meet NPDES program goals, including the Government Performance and Results Act (GPRA) measures reported to Congress. Under this Act, EPA and other agencies are required to develop long-range Strategic Plans, Annual Performance Plans with measures and targets, and Annual Performance Reports describing how well targets are met.[1] OMB is now linking Agency budgets, including funding for State grants, directly to each program's strategic plans and targets.

- EPA needs facility-specific data to inform the Program Assessment Rating Tool (PART) process, which is now used to assess 20% of all Federal programs each year. In combination, GPRA and PART require EPA to align program activities to annual performance plans, clarify organizational expected outcomes, manage outcomes rather than inputs and activities, and design measurement systems that accurately track results. In the PART process, OMB evaluates performance in program purpose and design, strategic planning, program management, and program results and accountability. State and Federal funding levels, including State grants, in the President's budget are now linked to PART and have been significantly impacted by the PART rating.

[1] Examples of GPRA measures for the NPDES program include tracking of schedules for combined sewer overflow (CSO) long-term control plans; percent of permits that are current; percent of scheduled high-priority permits that are current; number of facilities covered by storm water permits for municipalities (MS4s) and for construction; percent of concentrated animal feeding operations (CAFOs) covered by an NPDES permit; percent of significant industrial users (SIUs) in publicly-owned treatment works (POTWs) with pretreatment programs that implement applicable pretreatment requirements; and percent of known categorical industrial users in non-pretreatment POTWs that have control mechanisms that cover pretreatment requirements.

- EPA needs detailed information for its program oversight responsibilities. For example, Permitting for Environmental Results (PER) was established to analyze how the NPDES programs could improve integrity, efficiency, and environmental results in the face of declining resources, increasing backlogs, expansion of the NPDES program, and third-party petitions and lawsuits to withdraw NPDES Programs. Another example, the State Review Framework process is used to ensure minimum national consistency in State NPDES compliance and enforcement programs.

- EPA responds to frequent NPDES inquiries from various Congressional members, regarding certain facilities, companies, or activities that may be national in scope, particularly in conjunction with oversight hearings, requiring immediate access to multi-State, facility-specific data on particular pollutant discharges.

In the past, EPA primarily obtained this information from the Permit Compliance System (PCS). Since 1985, PCS served as the official national information system used for management of the NPDES program. The NPDES program has evolved considerably since the creation of PCS. In recent years, there has been an increasing realization, confirmed by State water quality reports, that, in addition to traditional major sources, smaller and/or non-traditional sources also contribute significantly to the pollution of our nation's waters. These smaller and non-traditional sources include facilities in particular program areas such as biosolids, concentrated animal feeding operations (CAFOs), combined sewer systems (CSSs), separate sanitary sewer systems (SSSs), stormwater and pretreatment.

The evolution of the NPDES program since the inception of PCS has created an increasing need to better reflect a more complete picture of the NPDES program and the diverse universe of regulated sources. PCS no longer meets the national needs of EPA to manage the NPDES program and no longer meets the NPDES program needs of individual States that use PCS to implement the NPDES program in their States.

During the past several years, EPA has worked closely with its State partners in an effort to modernize PCS as an NPDES component of EPA's existing Integrated Compliance Information System (ICIS). To accurately reflect the NPDES program, ICIS-NPDES was designed to include data and functionality for the full breadth of the NPDES program for a variety of permit types and program areas.

This Policy Statement describes the essential information (defined as the Requisite ICIS-NPDES Data Elements [RIDE]) EPA needs nationally to effectively manage the national NPDES program. These RIDE and the information that they represent are also essential to the individual permitting authorities for effective implementation and enforcement of the NPDES program.

This ICIS-NPDES Policy Statement establishes ICIS-NPDES as the database of record for the national NPDES program and seeks to ensure that ICIS-NPDES contains accurate, complete, consistent, and timely information, in accordance with the Data Entry Protocols specified in Section E.1. of this Policy Statement. Through implementation of this Policy Statement, EPA can effectively manage the NPDES national program to ensure that the human health and environmental protection goals of the CWA are met. This Policy Statement does not substitute for any CWA statutory provisions or EPA regulations and is intended as guidance pursuant to applicable regulations (e.g., 40 CFR§123.41(a)) .

B. Relationship of this ICIS-NPDES Policy Statement to the PCS Policy Statement (as revised since issuance in October 1985)

The PCS Policy Statement (issued in October 1985[2] and later revised) remains the Agency policy for use of PCS for those States, Territories and Tribes currently using or transferring data into PCS. The States, Territories and Tribes currently transferring data into PCS should review this ICIS-NPDES Policy Statement as certain steps should be taken now for a successful transition from PCS to ICIS-NPDES. As set forth in Section G, the transition plans for hybrid and non-direct (batch) users of ICIS-NPDES are intended to address this need for advance planning.

As a State, Territory or Tribe moves into ICIS-NPDES (whether as a direct user, hybrid user or as a non-direct user) and data is entered directly or is made available for batch transfer into ICIS-NPDES, the data entry roles, activities and responsibilities of that permitting authority are covered by this ICIS-NPDES Policy Statement. Water Enforcement National Data Base (WENDB) is the minimum required data when using PCS; Requisite ICIS-NPDES Data Elements (RIDE) have been identified as the minimum data that should be available in ICIS-NPDES.

C. RIDE and Key Data Groupings

This Policy Statement designates the specific set of data elements that are essential for EPA to effectively manage the national NPDES program. These data elements are the Requisite ICIS-NPDES Data Elements or RIDE for ICIS-NPDES. EPA has consulted with States and Regions extensively in developing and refining RIDE. In FY 2002, EPA and State staff and managers identified the data needed to successfully implement and manage the NPDES program. Their recommendations were discussed by the State and EPA members of the PCS Steering Committee, and subsequently adopted

[2] As issued in 1985, the PCS Policy Statement specified that: 1) PCS would be the national data base of record for the NPDES program; 2) the EPA Regions must use PCS directly; and 3) all NPDES authorized States must either use PCS directly or develop and maintain an interface that transfers the State's data to PCS. The PCS Policy Statement further defined the minimum required data necessary to enable PCS to function as a useful operational and management tool for the NPDES program; in PCS, this list of minimum required data was called WENDB.

by the PCS Modernization Executive Council as the first draft of what later came to be called RIDE.

EPA sought additional state input into RIDE and the development of this Policy Statement by expanding the Steering Committee to add representatives from the Environmental Council of States (ECOS) and the Association of State and Interstate Water Pollution Control Administrators (ASIWPCA). In 2006 and 2007, this Expanded Steering Committee held three face-to-face meetings, conducted numerous conference calls, and created several workgroups. Based on those efforts, EPA has made significant reductions in the initial RIDE list and other revisions to reduce the data entry burden.

RIDE can be grouped into four main data areas and several data sub-areas, as identified in Table 1 below.

Table 1: RIDE Overview by Data Areas

ICIS-NPDES Data Area	Sub-Areas	Customary Entry Frequency	Additional Permit Component Information
Facility	Basic Information, Contacts, Addresses, Latitude, Longitude	Once (updated if necessary)	None
Permit	Basic Information, Narrative Condition, Permit Schedule, Permitted Feature, Limit	Once/ permit cycle	Biosolids, CAFOs, CSSs, SSSs, Stormwater, Pretreatment
Compliance Monitoring	Inspections	Once/ year or less	
	Discharge Monitoring Reports (DMRs)	Once/ month/ limit	
	Violations	As they occur	
Enforcement	Basic Information, Milestones, Sub-activities, Final Orders, Penalties, Compliance Schedules	As they occur	None

The data element organization shown in Table 1 is reflected in Appendix 1, which is a chart that identifies how many RIDE are associated with each data area. For example, Appendix 1 indicates that there are 25 RIDE associated with facility data, 82 RIDE associated with permitting data, 125 RIDE associated with special program areas, and 53 RIDE associated with compliance monitoring and enforcement.

Appendix 1 also indicates that, of the 285 RIDE[3] to be entered or transferred into ICIS-NPDES by permitting authorities, 43 are conditional in that data entry or transfer is only expected under rare circumstances or if another RIDE is entered with a particular code. An example of such a conditional RIDE would be "Animal: Other" in the CAFO component sub-area of RIDE permit information; this data element would only be necessary if the entry of the RIDE "Animal: Type" (also in the CAFO component sub-area of permit information) was answered with something other than one of the animal types listed in the "drop-down menu" of the data entry screen in ICIS-NPDES.

A detailed list of all 285 RIDE, with columns providing information regarding data element descriptions, equivalent data elements in PCS, permit types for which that data element is needed, and comments is provided in Appendix 2a. Appendix 2a also identifies each of the 43 conditional RIDE by means of shaded rows on the table.

For a specific facility, not all of the 285 RIDE are likely to apply. The number of RIDE that will apply to a particular NPDES facility will vary based on facility-specific factors, such as the type of permit(s), the activities undertaken by the State, Territory, Tribe or EPA at the facility (e.g., inspections, enforcement actions), and the particular operations and processes engaged in by the facility in the particular program area (e.g., biosolids, CAFOs, CSSs, SSSs, stormwater and pretreatment). Appendix 3 describes the data entry considerations for various special program areas; Appendix 3a indicates the estimated data entry resources for various program areas and permit types.

As Table 1 indicates, the frequency of data entry for RIDE will vary depending on the type of data. Many data elements are entered once (e.g., those associated with facility identification); permit specific information is usually entered only once every five years; Discharge Monitoring Reports (DMRs) are generally entered monthly; inspection, violations and enforcement data are entered only if or as those activities occur. Some other data elements are system-generated for direct users. In addition, in an effort to reduce the resource burden of ICIS-NPDES startup, EPA is working with the individual States, Territories or Tribes to ensure that existing facility, permit, compliance monitoring and enforcement data is migrated from PCS to ICIS-NPDES.

D. Efficient Options to Provide Data into ICIS-NPDES

ICIS-NPDES is a user-friendly system, providing desktop access, real-time data and powerful reporting tools. ICIS-NPDES utilizes new technology and promotes integrated processing of information. Two efficient methods for States, Territories and Tribes to provide EPA with RIDE are through:

[3] An additional 27 RIDE are required for data entry into ICIS-NPDES by EPA Regions for Federal activities (e.g., inspections, enforcement actions) and for non-authorized States, Territories and Tribes for which the Region is manually entering RIDE. See Appendix 2b for a list of these additional Federal-only RIDE.

- direct data entry via user-friendly web interfaces, with point and click features and drop down menus, including easy-to-use DMR data entry screens; and,

- batch transferring of data, using approved ICIS-NPDES XML schema, via the Agency's Central Data Exchange (CDX) portal and the National Environmental Information Exchange Network, and possible utilization of an electronic DMR tool, such as NetDMR for facilities.

Data transfer to ICIS-NPDES is expected to be seamless and transparent. EPA recognizes that some States, Territories or Tribes may use both methods of data entry, depending on the type of data and their own needs. Because consistent and objective compliance tracking is a central component of an effective and credible enforcement program, States, Territories and Tribes are encouraged to use ICIS-NPDES directly as a primary management system for their NPDES programs. (EPA Regions are required to directly use ICIS-NPDES.)

However, because some States already have their own NPDES databases and plan to continue using them to manage the program, these States may batch transfer data to ICIS-NPDES. EPA is working with non-direct-user (batch) States through an Integrated Project Team (IPT) to develop, test and implement the batch transfer of RIDE to ICIS-NPDES. Batch transfer programs from States, Territories and Tribes should conform to EPA Central Data Exchange procedures and should use approved ICIS-NPDES XML schema formats.

EPA has provided grants to assist States in making the transition from PCS to ICIS-NPDES. For example, during FY 2004-2005, ICIS-NPDES was addressed in 13 Exchange Network grants to facilitate batch information exchange from States that are not direct users of ICIS-NPDES. During that same period, EPA's Office of Enforcement and Compliance Assurance (OECA) also provided 21 grants totaling $3.57 million in preparations at the State level to migrate data from PCS into ICIS-NPDES or to otherwise transition into ICIS-NPDES.

The RIDE Data Entry Estimate Model developed in association with the Expanded Steering Committee has estimated that over 90% of RIDE data entry resources are associated with data entry of DMRs. To maximize efficiencies realized already by some States, EPA encourages States, Territories and Tribes to pursue electronic reporting of DMR data directly by permitted facilities. Electronic DMR submission (verification, authentication, and authorization) should be consistent with the Agency's requirements set forth in the Cross-Media Electronic Reporting Final Rule (*Federal Register*, October 13, 2005).

EPA is working with States to create a national tool (NetDMR) to support electronic reporting of DMR data directly from facilities to the permitting authority, a feature that will dramatically reduce the cost of entering DMR data into ICIS-NPDES as well as into State information systems. Electronic reporting of DMR data will increase the quality and amount of DMR data available, while leading to reduced manual data

entry costs. This will improve implementation and management of the NPDES program by increasing the available effluent data that states and EPA can use to identify and target compliance and environmental problems. As many as 20 States are developing electronic DMR reporting systems or have applied for EPA grants to develop such systems, and a handful of States have already implemented online electronic DMR reporting tools.

E. ICIS-NPDES Data Entry Expectations

1. Data Entry Protocols

Once a State, Territory, Tribe or EPA begins using ICIS-NPDES, they are expected to follow data entry, timeliness and quality protocols that govern EPA data. EPA may assess these protocols on a regular basis. In summary, all data entered or batched into ICIS-NPDES should be:

- Timely: Data for a State, Territory or Tribe should be entered or batched into ICIS-NPDES within 30 days of the event/action. For EPA Regions, data for inspections, single event violations, and enforcement actions should be entered into ICIS-NPDES within 14 days; Regions should enter permit limits, permit limit sets, DMRs and other RIDE into ICIS-NPDES within 30 days of receipt. Timely data is critical because ICIS-NPDES provides "real time" data for use and analysis. In addition, some of this data is accessible to the public through ECHO and Envirofacts.

- Accurate: The design of ICIS-NPDES, with "drop-down" menu lists, standard Oracle data validation checks, data standards and ICIS-NPDES XML schema will greatly reduce data entry errors. RIDE data should be identical with that reported on the DMR, permit or other input document.

- Complete: Reporting of RIDE ensures that all necessary information is available for the purposes of program management, oversight and reporting. This ICIS-NPDES Policy Statement establishes an overall goal of at least 98% completeness for data entry and, in the appendices to this document, describes other targets related to data completeness during the transition period (such as interim national data targets for DMR data entry for non-major facilities).

- Consistent: Data needs to be comparable for use in national and interstate watershed analyses and the ICIS-NPDES system design incorporates the Agency Data Standards requirements to provide consistent standards for reporting. To ensure national consistency, batch transfer programs from States and Tribes should conform to EPA Central Data Exchange procedures and should use approved ICIS-NPDES XML schema formats.

2. "Prospective" Entry/Availability of Non-WENDB Data

For those RIDE that were not WENDB data elements in PCS, data entry/availability of RIDE in ICIS-NPDES should be "prospective" in nature. That is, the RIDE data entry or transfer into ICIS-NPDES for these particular elements should be completed from some date forward (in accordance with approved transition plans, as described in Sections F and G) without a need to enter old data. One caveat to this rule occurs in the case of new enforcement actions addressing violations that are not already in the system; EPA expects violation (and any relevant inspection) information associated with these actions to be entered into ICIS-NPDES with the enforcement actions.

3. Few Data Entry Distinctions between Majors and Non-Majors

In PCS, some WENDB data elements apply to every facility regardless of its permit type; other WENDB data elements in PCS apply just to major facilities. However, in ICIS-NPDES, unlike PCS, few distinctions in data entry expectations for RIDE have been made between major facilities and non-major facilities. Exceptions include the "phased-in" data entry of DMRs, associated limits, and limit sets for non-majors (as described above), and distinctions for some program areas, as described below and in Appendix 3, which provides a brief synopsis for each program area.

4. Appropriate Linkages in ICIS-NPDES

Appropriate linkages between the data for compliance monitoring, violations and enforcement items should be entered into ICIS-NPDES. For example, an inspection should be linked to all violations identified during the inspection, which in turn should be linked to any resulting enforcement action, penalty or compliance schedule. In addition, the information for an unpermitted facility which subsequently becomes a permittee could be linked in ICIS-NPDES.

5. Violation Tracking

The automatic tracking function in ICIS-NPDES for DMR non-receipt and other violations (e.g., compliance schedule) will be "turned on" for both majors and non-majors. For non-major permits, this can be "turned off" during the transition period (described in Section G) and turned back on as DMR entry begins for those facilities, but no later than the final expected data entry date listed in that State's or Tribe's transition plan (also described in Section F). This will allow EPA, States and Tribes to obtain the full benefit of automatic tracking of these violations and makes effective use of the resources allocated to data collection and data entry. In addition, such tracking may be

very beneficial to automate NPDES reporting requirements such as the Annual Non-Compliance Report for NPDES Non-Majors required by 40 CFR §123.45 (c).

6. Significant Industrial Users in Non-Pretreatment Cities

RIDE data on specific Significant Industrial Users (SIUs) are only expected in ICIS-NPDES if the pretreatment control authority is EPA, the State, the Territory, or the Tribal permitting authority, rather than a municipal treatment facility implementing an approved local pretreatment program. However, States, Territories, Tribes and Regions could use ICIS-NPDES to track additional SIUs, if so inclined.

7. Stormwater Construction Sites

For the large universe of stormwater construction sites, RIDE should be entered or transferred into ICIS-NPDES for States, Territories and Tribes if the State, Territory or Tribe issues the facility (whether Phase I or Phase II) a formal enforcement action, an administrative penalty order, or an informal enforcement action (but only if the informal enforcement action addresses significant non-compliance [SNC][4] under that construction site permit). In such circumstances, RIDE should be entered or transferred into ICIS-NPDES for the facility information and permit information for that site (if not already available in ICIS-NPDES), the enforcement action, penalty or compliance schedule, and all inspections and associated identified violations which precipitated that enforcement action. As indicated in Appendix 4, these enforcement actions, inspections, and all other RIDE for stormwater construction sites should begin to entered or transferred into ICIS-NPDES as they occur effective August 1, 2007, or within four months after migration to ICIS-NPDES. For all other stormwater construction sites, data from DMRs, associated limits and limit sets need not be entered into ICIS-NPDES.

For EPA Regions, RIDE for all stormwater construction inspections performed by the Regions and all resulting enforcement actions by the Regions are expected to be entered into ICIS-NPDES and linked appropriately. In order to enter RIDE data into ICIS-NPDES, the facility information and permit information for that site will have to be entered into ICIS-NPDES by the Region (if such information is not already available in ICIS-NPDES).

8. Satellite Collection Systems to Separate Sanitary Sewer Systems (SSSs); Other Unpermitted Facilities

The ICIS 2.0 Users Guide (Permits section) states that: "Unpermitted facilities are records established in ICIS to allow for tracking of activities (e.g., inspections and

[4] Significant non-compliance (SNC) for stormwater construction sites and which informal enforcement actions will address such SNC will be defined in the wet weather SNC guidance, currently under development by EPA.

enforcement actions) that are associated with facilities that do not have [NPDES] permits. They may not contain narrative conditions, schedules, or limits."

RIDE data entry is not expected for those portions of a State program that are "broader in scope" than the approved NPDES program (under 33 U.S.C. § 1342(b)). In general (except for SIUs in non-pretreatment cities), RIDE data are expected to be entered into ICIS-NPDES for unpermitted facilities only if the facility has been issued a formal enforcement action, an administrative penalty order, or an informal enforcement action (but only if the informal enforcement action addresses significant non-compliance, or if the facility should have a NPDES permit. In such situations, the facility RIDE and permit RIDE (if any) should be entered into ICIS-NPDES before the compliance monitoring, violation and enforcement information can be entered and appropriately linked.

For example, for SSS satellite systems, RIDE should be entered if the SSS satellite system receives a formal enforcement action, an administrative penalty order, or an informal enforcement action (but only if the informal enforcement action addresses the SSS significant non-compliance [SNC][5]). In such circumstances, RIDE should be entered for the facility information and permit information (if any) for that site, the enforcement action, penalty or compliance schedule, and all inspections and identified violations which precipitated that enforcement action.

F. Data Entry Targets for National Consistency

EPA expects that there will be a transition period (described in Section G) as States become acclimated to ICIS-NPDES as a new information system. In addition, EPA recognizes that non-direct-user States, Territories and Tribes may need to take steps to adjust their own information systems to include all RIDE and then map to the appropriate ICIS-NPDES XML schema so that data from their data systems will transfer to ICIS-NPDES; such adjustments and mapping also should be addressed in transition plans. EPA will rely on ICIS-NPDES for direct user States, Tribes and Regions and will continue to rely on PCS information for non-direct-user States, Territories and Tribes until they have migrated to ICIS-NPDES. PCS will be shut down once all States, Territories and Tribes have been migrated to ICIS-NPDES.

NPDES-authorized States, Territories or Tribes have the flexibility within the transition plan to identify a specific prioritization scheme for RIDE data entry or transfer by specific dates. Although NPDES-authorized States, Territories or Tribes have flexibility in the specifics of the transition plan, there are several national data targets which should also be incorporated into the transition plan. These national targets, set forth in Appendix 4, are intended to provide national consistency so that EPA can begin to use ICIS-NPDES for national analysis for certain data sets.

[5] Significant non-compliance (SNC) for SSSs and which informal enforcement actions will address such SNC will be defined in the wet weather SNC guidance, currently under development by EPA.

EPA has set national data targets based on permit type, program area and data family. These national targets are based on an approach similar to that developed by the Matrix Priority Workgroup, a subgroup of the Expanded Steering Committee, in June to August 2006. These national target dates apply to all States, Territories, Tribes and Regions, whether direct, hybrid or non-direct (batch) users of ICIS-NPDES, with the provision that the dates may be extended as necessary up to four months after a State, Territory, Tribe or Region migrates to ICIS-NPDES.

1. Ensure ICIS-NPDES data entry or transfer of those RIDE for which WENDB equivalents existed in PCS

Existing WENDB elements are expected to be up-to-date when the permitting authority begins RIDE data entry or transfer into ICIS-NPDES. States, Territories, Tribes and Regions scheduled to migrate to ICIS-NPDES are encouraged to ensure that all WENDB data is complete and accurate in PCS before data migration occurs. Therefore, data entry or transfer into ICIS-NPDES for those RIDE for which WENDB equivalents existed in PCS is expected to be available in ICIS-NPDES very early in the transition period.

2. Entry of Non-DMR Compliance Monitoring, Violations and Enforcement as They Occur

With the exception of certain stormwater construction sites as discussed in Section E.8., data associated with non-DMR compliance monitoring (e.g., inspections), single event violations, enforcement actions, penalties, and compliance schedules are to be entered or otherwise made available into ICIS-NPDES as those events occur, and in accordance with the Data Entry Protocols (described in Section E.1.). Appropriate linkages should be made within ICIS-NPDES, as described in Section E.5. If there is compliance monitoring or enforcement activity at a facility without corresponding Facility or Permit Data in ICIS-NPDES, then that Facility and/or Permit information should be entered into ICIS-NPDES in order for compliance and enforcement events to be properly entered into the system. As indicated in Appendix 4, enforcement actions, inspections and violations are expected to be entered or transferred into ICIS-NPDES prospectively after August 1, 2007, or within four months after migration to ICIS-NPDES.

3. Phase-In of Limits and DMRs for Non-Majors

States, Territories, Tribes and EPA Regions may “phase-in” the data entry of DMRs (and associated limits and limit sets) for non-majors. Under this phase-in, the data entry or transmission of DMRs (also limits and limit sets) to ICIS-NPDES for non-majors should be prioritized to focus initially on those non-majors located in priority watersheds (impaired watersheds). Appendix 4 describes the national targets for DMR entry and

availability in ICIS-NPDES for non-majors. These national data targets for DMR data entry and transfer for non-major facilities are based on the concept that the permitting authority may prioritize certain non-major facilities for DMR data entry, with DMR RIDE for the other non-majors awaiting the availability of NetDMR. For the first few years of implementation of this policy statement, EPA Headquarters will annually assist each State, Tribe and Region by providing a list of non-major facilities located in priority watersheds; this list could then be used for determining priorities for DMR (as well as other RIDE) data entry into ICIS-NPDES.

4. Permit Data Not Yet Collected

If there is permit RIDE data that a State or Tribe currently does not collect or have in its existing permit or permit application, availability of these particular data elements in ICIS-NPDES may be delayed until reissuance of the permit. For example, if a particular permit does not yet require the metadata associated with latitude and longitude for pipe locations, those particular RIDE for that permittee may be delayed until reissuance of the permit. All individual non-stormwater NPDES permits are issued on a five-year cycle; therefore, all permit RIDE should be complete within five years of issuance of this Policy Statement.

G. Development and Implementation of Transition Plans

Each NPDES-authorized State, Territory, Tribe or EPA Region should develop a transition plan which describes how and when RIDE data entry or transfer to ICIS-NPDES will occur (note: data transfer is not available to EPA Regions other than in the data migration from PCS to ICIS-NPDES). This transition plan should include an implementation schedule designed to result in RIDE data entry or transfer into ICIS-NPDES by the end of the transition period. The transition period applies primarily to those RIDE without WENDB equivalents in PCS.

The approach taken to ensure such data entry or transfer into ICIS-NPDES may vary to some degree by State, Territory, Tribe or Region depending on the current status and projected availability of the data and resources. States, Territories, Tribes and Regions are encouraged to work with the existing RIDE Data Entry Estimate Model when developing their ICIS-NPDES transition plan to quantify and assess the resource implications for data entry of specific data types or program areas.

The national ICIS-NPDES data targets are described in Appendix 4. A template of a transition plan is included as Appendix 5.

The schedule for submission of such recommended transition plans will vary based upon the type of ICIS-NPDES user (i.e., direct users, hybrid users and non-direct users) (see Appendix 4). Hybrid and non-direct (batch) users have been given four additional months to understand the ICIS-NPDES XML schemas as part of the process of

developing their transition plans. The transition plan and milestone schedule for NPDES-authorized States and Tribes will be reviewed and approved by EPA Regions at the Division Director level (Enforcement and Water) within three months of submission of that plan by the State or Tribe to EPA. Similarly, transition plans and milestone schedules for non-authorized States, Territories and Tribes will be developed by EPA Regions, with review and approval by EPA Headquarters within three months of Regional submission. These activities are included in the ICIS-NPDES roles and responsibilities table in Appendix 6.

EPA Regions should seek to incorporate the activities and schedule in the approved transition plan into subsequent State-EPA or Tribe-EPA management agreements, performance partnership grants (PPGs) or performance partnership agreements (PPAs), when these agreements are due for renewal, throughout the transition period. At the end of the transition period, when States and Tribes have fully implemented RIDE entry, the State-EPA or Tribe-EPA management agreement, PPG or PPA should be modified, when these agreements are due for renewal, to reflect the need for continued timely, accurate and complete entry and availability of RIDE data.

H. Additional Operational Activities

To ensure a smooth and effective operation of ICIS-NPDES, permitting authorities should undertake a variety of additional activities, including those listed below:

1. Participate in ICIS-NPDES Governance: A governance structure with Headquarters, Regional, and State representatives will be formed for making decisions regarding ICIS Release 2.0 and subsequent releases. The governance structure will institute a standard communication and decision-making process for system enhancements and system issues.

2. Establish and Maintain Roles and Responsibilities: Defining and maintaining clear roles, responsibilities and activities is essential to managing a decentralized national data base such as ICIS-NPDES. Appendix 6 identifies these roles and responsibilities for States, Territories, Tribes, EPA Regions, and for various offices at EPA Headquarters.

3. Monitor Data Quality: As the data is migrated to the new system and as users become familiar with ICIS-NPDES, permitting authorities should pay particular attention to reviewing data reports and results to ensure that the data is entered correctly and reporting is accurate and timely. As ICIS-NPDES problems arise, they should be reported to user support; user support, in turn, will elevate problems to the governance structure as appropriate.

   As described earlier in this document, timely, accurate, complete and consistent reporting is the foundation for effective program management and reliable public access to data; therefore, data quality will remain an area of focus for ICIS-

NPDES implementation. As States and Tribes move beyond transitioning into ICIS-NPDES and the system becomes the established national NPDES data base of record, careful attention should be paid by all parties to data quality, with procedures and checklists in place to ensure that RIDE data is entered within set timelines and is entered completely and accurately.

I. Policy Revision and Relationship to Other Policies

The NPDES program will continue to evolve. States and EPA will need to work together to ensure that program guidance reflects program and policy changes. As new guidance documents are developed or as existing guidance is modified, close coordination between these documents and ICIS-NPDES will be needed to determine whether and how ICIS-NPDES can support these changes. For example, EPA is currently working with States on finalizing various guidance documents and policies that may be useful to the NPDES-authorized agencies; such guidance documents and policies include the wet weather SNC guidance document, the Compliance Monitoring Strategy, the ICIS-NPDES Data Element Dictionary, and the Single Event Violation Data Entry Guide. Changes needed to ICIS-NPDES to accommodate new regulations, guidance documents, or policy will be directed to the established ICIS-NPDES governance structure.

EPA expects to review on a periodic basis (of approximately five years) how well this ICIS-NPDES Policy Statement is meeting the business needs of the NPDES program. EPA anticipates that the first such review will occur two to three years after issuance of this Policy Statement to assess the success of the transition plans and the experience of working with the batch transfer process.

APPENDIX 1:
RIDE by Data Area and Program Area

Core Data Requirements	# of Data Elements
Facility	25
Permitting	82
Compliance Monitoring	33
Enforcement	20
Total	160 (incl. 22 conditional)

NOTE: 123 RIDE elements are system - required

Additional 125 Special Regulatory Elements

Biosolids	CAFOs	CSO/SSOs	Pretreatment	Storm Water
17	49 (incl. 7 conditional)	19 (incl. 12 conditional)	33 (incl. 2 conditional)	7

Total RIDE Elements = 285 (including 43 conditional)

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1. This column provides the PCS acronyms that correspond to each RIDE element. If blank, there is no known equivalent. Also, the PCS acronyms represent WENDB elements required in PCS, unless otherwise noted.

2. From the ICIS-NPDES Detailed Design Document (page 4-2): "Data elements are marked as system required when entry of the data element is required by ICIS-NPDES in order for a user to add a particular record into the system... If [system-]required data elements are not entered, ICIS-NPDES will reject the transaction."

3. From the ICIS 2.0 Users Guide (Permits section): "Unpermitted facilities are records established in ICIS to allow for tracking of activities (e.g., inspections and enforcement actions) that are associated with facilities that do not have [NPDES] permits. They may not contain narrative conditions, schedules, or limits." Data entry requirements do not apply to those portions of a State program that are "broader in scope" than the approved NPDES program (under 33 U.S.C. § 1342(b)). Except for SIUs in non-preatreatment cities, the facility, compliance monitoring, and enforcement data for unpermitted facilities is only RIDE if there has been a formal enforcement action, an administrative penalty order or an informal enforcement action that addressed SNC. For SIUs in non-pretreatment cities, RIDE is expected. Examples of unpermitted facilities include SSS satellite systems and AFOs that, after inspection, are determined to be CAFOs requiring a NPDES permit.

Note: Highlighted rows indicate RIDE that are conditionally-required and only need to be entered under certain circumstances, as described in the "Sytem-Required" column and the "Comment" column. Some of these fields are only required based on the presence/ absence of another RIDE; others only need to be entered rarely.

Area	**Sub-Area**	**Data Element Name**	**PCS equivalent (if available)**[1]	**RIDE Data Element Description**	**System Required**[2]	**Permit Type in ICIS-NPDES**				**Comment**
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
FACILITY DATA ELEMENTS										
Facility	Basic Info	Facility Type of Ownership	TYPO	The code/ description identifying the type of facility (e.g., State Government, Municipal or Water Distric, Federal Facility). This data element is used by the system to populate the Permit Facility Type data element (i.e., POTW, Non-POTW, Federal).	No	Yes	Yes		Yes	
Facility	Basic Info	Facility Site Name	RNAM	The name of the facility.	Yes	Yes	Yes		Yes	
Facility	Basic Info	Address	RST1	The address of the physical facility location.	Yes	Yes	Yes		Yes	
Facility	Basic Info	City	RCTY	The name of the city, town, village, or other locality, when identifiable, within whose boundaries (the majority of) the facility site is located. This is not always the same as the city used for USPS mail delivery.	Yes	Yes	Yes		Yes	
Facility	Basic Info	State	RSTT	The USPS abbreviation that represents the state or state equivalent for the US and Canada.	Yes	Yes	Yes		Yes	
Facility	Basic Info	Zip Code	RZIP	The combination of the 5-digit Zone Improvement Plan (ZIP) code and the 4-digit extension code (if available) that represents the geographic segment that is a sub unit of the ZIP Code assigned by the U.S. Postal Service to a geographic location.	Yes	Yes	Yes		Yes	
Facility	Basic Info	Tribal Land	HQ01	The Bureau of Indian Affairs code for every unit of land within Indian Country.	No	Yes	Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Facility	Lat/Long	Longitude	FLON	The measure of the angular distance on a meridian east or west of the prime meridian for a Facility Interest. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Latitude	FLAT	The measure of the angular distance on a meridian north or south of the equator for a Facility Interest. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Facility Source Map Scale Number	FLLS	The number that represents the proportional distance on the ground for one unit of measure on the map or photo.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Horizontal Accuracy Measure	FLLC	The measure of the accuracy (in meters) of the latitude and longitude coordinates.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Horizontal Collection Method	FLLM	The text that describes the method used to determine the latitude and longitude coordinates for a point on the earth.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Horizontal Reference Datum	FLLT	The code/ description that represents the reference datum used in determining latitude and longitude coordinates.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Lat/Long	Reference Point	FLLD	The code/ description for the place for which geographic coordinates were established.	No	Yes	Yes		Yes	except for Storm Water - construction permits
Facility	Non-Gov Contacts	Affiliation Type		The way that the contact is affiliated with the Facility (e.g., Owner)	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Main Contact", and "Operator"
Facility	Non-Gov Contacts	First Name		The given name of an individual.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Main Contact", and "Operator"
Facility	Non-Gov Contacts	Last Name		The surname of an individual.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Main Contact", and "Operator"
Facility	Non-Gov Contacts	Individual Title		The title held by a person in an organization.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Main Contact", and "Operator"
Facility	Non-Gov Contacts	Organization	MNAM, ONAM	The legal, formal name of an organization that is affiliated with the facility site.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Main Contact", and "Operator"
Facility	Non-Gov Address	Street Address	MST1, OST1	The address that describes the physical location of a building or event, including urban-style street address or rural address.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Facility	Non-Gov Address	Affiliation Type		The way that the contact or address is affiliated with the Facility (e.g., Owner)	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)
Facility	Non-Gov Address	Organization Formal Name	MNAM, ONAM	The legal, formal name of an organization that is affiliated with the facility site.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)
Facility	Non-Gov Address	City	MCTY, OCTY	The name of the city in which the address exists.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)
Facility	Non-Gov Address	State	MSTT, OSTT	The U.S. Postal Service abbreviation that represents the state or state equivalent for the U.S.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)
Facility	Non-Gov Address	Zip Code	MZIP, OZIP	The combination of the 5-digit Zone Improvement Plan (ZIP) code and the 4-digit extension code (if available) that represents the geographic segment that is a sub unit of the ZIP Code assigned by the U.S. Postal Service to a geographic location.	No	Yes	Yes		Yes	Only for Affiliation Type "Owner", "Mailing", and "Integrator" (only for CAFOs)
PERMIT DATA ELEMENTS										
Permit	Basic Info	NPDES ID	NPID	This is the NPDES permit number.	Yes		Yes	Yes	Yes	
Permit	Basic Info	Master General Permit Number	NPID	The unique identifier of the master general permit which is linked to a General Permit Covered Facility.	Yes, when adding a General Permit Covered Facility permit.				Yes	Only when adding a General Permit Covered Facility permit.
Permit	Basic Info	Permit Type	PTYP	The unique code/ description identifying the type of permit.	Yes		Yes	Yes	Yes	
Permit	Basic Info	Issue Date	PTEV, PTAC (PERD)	This is the date the permit was issued.	Not for new permits, but for compliance tracking or reissuance		Yes	Yes	Yes	
Permit	Basic Info	Effective Date	PTEV, PTAC (PEFD)	This is the date on which the permit is effective.	Not for new permits, but for compliance tracking or reissuance		Yes	Yes	Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	Basic Info	Expiration Date	PTEV, PTAC (PERE)	This is the date the permit will expire.	Not for new permits, but for compliance tracking or reissuance		Yes	Yes	Yes	
Permit	Basic Info	Termination Date	IADT	This is the date the permit was terminated.	No		Yes	Yes	Yes	
Permit	Basic Info	Major/Minor Rating Code	MRAT	This is the numeric total of ranking points assigned to non-POTW facilities and used to delineate them as a major or minor facility. The numeric value entered for this data element comes from the total score assigned to the facility on the NPDES Permit Ranking Work Sheet.	No		Yes		Yes	
Permit	Basic Info	Total App. Design Flow	FLOW	This is the flow that a permitted facility was designed to accommodate, in MGD.	No		Yes		Yes	
Permit	Basic Info	Total App. Actual Avg. Flow	FLOW	This is the actual flow that a permitted facility accomodated based on the application, in MGD.	No		Yes		Yes	The flow that a permitted facility actually had at the time of application.
Permit	Basic Info	Complete Application/NOI Received Date	PTEV (P2099) (not WENDB), PTAC	This is the date on which the complete application for a NPDES permit was received.	No		Yes		Yes	Either complete date or received data must be entered because this element is tied to "Permit status".
Permit	Basic Info	Application/NOI Received Date	PTEV, PTAC (APRD)	This is the date on which the application for a NPDES permit was received.	No		Yes		Yes	Either complete date or received data must be entered because this element is tied to "Permit status".
Permit	Basic Info	Permit Status		This is a code/ description that indicates whether the permit is Effective, Expired, Administratively Continued, Pending, Not Needed, Retired, or Terminated.	Yes		Yes	Yes	Yes	Effective, Expired, Administratively Continued, Pending, Retired are system-generated based on Permit dates. Not Needed and Terminated are manually entered.
Permit	Basic Info	General Permit Industrial Category	GPCT	This code/ description that identifies the industrial category of a general permit.	Yes			Yes		
Permit	Basic Info	Issuing Organization Type	EPST	This is the type of organization issuing or granting a permit.	Yes		Yes	Yes	Yes	
Permit	Basic Info	DMR Non-Receipt		Turns Non-Receipt tracking on/off for Minors. Always on for Majors. Defaulted initially to On.	Yes		Yes		Yes	System-generated to "yes" for all permits. Change to "no" for minors must be manually entered.
Permit	Basic Info	RNC		Turns RNC tracking on/off for Minors. Always on for Majors. Defaulted initially to On.	Yes		Yes		Yes	System-generated to "yes" for all permits. Change to "no" for minors must be manually entered.
Permit	Basic Info	Applicable Effluent Limit Guideline	CFRC	The effluent guideline that applies to the permit.	No		Yes	Yes	Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	Basic Info	Compliance Tracking Status	IACC	This is a code/ description that indicates whether the permit is currently on or off for compliance tracking purposes. Initially system-generated to match effective date.	Yes		Yes		Yes	
Permit	Basic Info	Compliance Tracking Status Start Date	IADT	This is the date on which the permit's on or off period for compliance tracking status began. Initially system-generated to match effective date.	Yes		Yes		Yes	
Permit	Basic Info	RNC Status Quarter	CYMS, PYMS	The quarter of the Permit RNC status.	No		Yes		Yes	System-generated for web users; RIDE for batch users.
Permit	Basic Info	RNC Status Year	CYMS, PYMS	The year of the Permit RNC status.	No		Yes		Yes	System-generated for web users; RIDE for batch users.
Permit	Basic Info	RNC Status (Manual)	CYMS, PYMS	The status of reportable noncompliance as it was entered by the user before the official QNCR for the RNC quarter for the permit.	No		Yes		Yes	
Permit	Basic Info	SIC Codes	SIC2	The four digit Standard Industrial Classification (SIC) code/ description that represents the economic activity of a company.	No	Yes	Yes	Yes	Yes	
Permit	Basic Info	Associated NPDES Permit	SLID	This is the NPDES number of the associated permits.	No		Yes		Yes	
Permit	Basic Info	NAICS Codes		The six digit code/ description that represents a subdivision of an industry that accomodates user needs in the US.	No	Yes	Yes	Yes	Yes	
Permit	Permittee	Street Address	RST1	The address that describes the physical location of the permittee.	Yes		Yes		Yes	
Permit	Permittee	Organization Formal Name	NAM1	The legal, formal name of an organization that is affiliated with the facility site.	Yes		Yes		Yes	
Permit	Permittee	Zip Code	RZIP	The combination of the 5-digit Zone Improvement Plan (ZIP) code and the 4-digit extension code (if available) that represents the geographic segment that is a sub unit of the ZIP Code assigned by the U.S. Postal Service to a geographic location.	Yes		Yes		Yes	
Permit	Permittee	City	RCTY	The name of the city, town, or village where the mail is delivered.	Yes		Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	Permittee	State	RSTT	The U.S. Postal Service abbreviation that represents the state or state equivalent for the U.S.	Yes		Yes		Yes	
Permit	Biosolids	Annual Dry Sludge Production	SLPV	The amount of sludge a facility produces in DMT/year on a dry weight basis.	No		Yes		Yes	with Biosolids permit component
Permit	Biosolids	Amount EQ Product Distribute and Marketed		The amount (dry metric tons) of EQ product distributed.	No		Yes		Yes	with Biosolids permit component
Permit	Biosolids	Amount Land Applied		The amount (dry metric tons) of biosolids land applied.	No		Yes		Yes	with Biosolids permit component and permitted feature type of land application site
Permit	Biosolids	Amount Incinerated		The amount (dry metric tons) of biosolids incinerated.	No		Yes		Yes	with Biosolids permit component and permitted feature type of incinerator
Permit	Biosolids	Amount Codisposed in an MSW Landfill		The amount of dry metric tons co-disposed in a MSW landfill.	No		Yes		Yes	with Biosolids permit component and permitted feature type of co-disposal site
Permit	Biosolids	Amount Surface Disposal		The amount (dry metric tons) of biosolids used for surface disposal.	No		Yes		Yes	with Biosolids permit component and permitted feature type of surface disposal site
Permit	Biosolids	Amount Managed Other Methods		The amount (dry metric tons) of biosolids managed using methods not previously described.	No		Yes		Yes	with Biosolids permit component
Permit	Biosolids	Biosolids End Use Disposal Type	SLDG	This is the code identifying the type of end use disposal.	No		Yes		Yes	with Biosolids permit component
Permit	CAFO	Designation Reason		If the facility was designated, indicate the reason the facility was designated, such as the amount of waste reaching waters, location, slope, rainfall, etc.	Yes, if "yes" is entered for "Is the Animal Facility a CAFO?" and "small" is entered for CAFO classification		Yes		Yes	with CAFO Permit Component
Permit	CAFO	CAFO Designation Date		If the facility received a permit as a result of being designated, indicate the date on which the facility is designated as a CAFO.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Solid Manure or Litter Generated		The total amount of manure in tons generated annually by the facility.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Solid Manure or Litter Transferred		The number of tons of manure or litter produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Liquid Manure or Wastewater Generated		The total amount of manure in gallons generated annually by the facility.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Liquid Manure or Wastewater Transferred		The total amount of manure in gallons produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with CAFO Permit Component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	CAFO	NMP Developed Date		The date that an NMP was developed by the facility.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	CAFO Classification		The unique code/ description that identifies the how the facility was classified for a "Concentrated Animal Feeding Operation?" Options are Large, Medium and Small (Designation).	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Animal: Type		The unique code/ description that identifies the operation's applicable animal sector(s).	Yes		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Animal: Other		The free-form text field to describe the operation's applicable animal sector if Other is selected for Animal Type Code.	No		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "animal type".
Permit	CAFO	Total Number		The total number of each type of livestock at the facility.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Containment: Type		The unique code/ description for the type of containment used by the operation.	Yes		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Containment: Total Capacity		The total capacity, in gallons, of the containment structure.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Containment: Other		The free-form text field to describe the type of containment if Other is selected for Containment Type Code.	No		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "containment type".
Permit	CAFO	Storage: Type		The unique code/ description that describes the type of storage used by the CAFO.	Yes		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "storage type".
Permit	CAFO	Storage: Other		The free-form text field to describe the type of storage used by the operation if the Other code is selected for storage type code attribute.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Days of Storage		This is how many days of storage there were for each storage type selected.	No		Yes		Yes	with CAFO Permit Component
Permit	CAFO	Storage Total Capacity Measure		This is the total capacity, in tons or gallons, of the storage structure.	No		Yes		Yes	with CAFO Permit Component
Permit	Storm Water	State Water Body Name	RWAT?	This identifies the name(s) of the receiving water into which the storm water flows directly.	No		Yes		Yes	with Storm Water Permit Component
Permit	Storm Water - Construction	NOT Terminate Date		This is the date on which the facility''s coverage was terminated.	One data element must be entered in this section to save the record				Yes	with a Storm Water - Construction Permit Component
Permit	Storm Water - Construction	Entire Project Size		This code describes the plan size of the project (<1 acre, 1-5 acres, or >5 acres).	At least 1 element is required to save this component		Yes		Yes	with a Storm Water - Construction Permit Component
Permit	Storm Water - Industrial	NOT Terminate Date		This is the date on which the coverage was terminated.	No				Yes	with Storm Water - non-construction components

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	Storm Water - Industrial	No Exposure Authorized Date		This is the date on which the No Exposure Waiver was authorized.	No				Yes	with Storm Water - non-construction components
Permit	Storm Water - MS4	MS4 Permit Class		This is the code/ description that identifies the regulatory basis for MS4 permit (small/medium/large)	Yes		Yes		Yes	with Stom Water-MS4 Permit Component
Permit	Storm Water - MS4	Receiving MS4 Name		This is the name of the receiving MS4(s).	No		Yes		Yes	with Stom Water-MS4 Permit Component
Permit	CSO	CSS Population Served		This is the population served by the combined sewer system (individuals or households).	Yes		Yes			with CSO Permit Component
Permit	CSO	Percent of Collection System Combined		This is the percentage of the total collection system that is combined.	Yes		Yes			with CSO Permit Component
Permit	CSO	Name of CSS Satellite Collection System		This is the name of each satellite collection system providing flow to the permittee.	No		Yes		Yes	with CSO Permit Component
Permit	CSO	Permit ID of CSS Satellite Collection System		This is the permit ID of each satellite collection system providing flow to the permittee.	No		Yes		Yes	with CSO Permit Component
Permit	Pretreatment	Pretreatment Program Required Indicator	PRET	The code/ description indicating if the permitted municipality is required to develop a pretreatment program.	Yes		Yes			with POTW and Pretreatment Permit Component
Permit	Pretreatment	Pretreatment Program Approved Date		The date the pretreatment program is approved.	Yes, if Pretreatment Program Required Indicator is "Approved".		Yes			with POTW and Pretreatment Permit Component
Permit	Pretreatment	Control Authority NPDES ID	CAID	The permit ID of the POTW's or IU's control authority.	Yes, if PRetreatment Program Required Indicator is "Covered".		Yes			with POTW and Pretreatment Permit Component
Permit	POTW	SSCS Population Served		This is the population served by the sanitary sewer collection system (individuals or households). This data element applies to all POTWs.	Yes		Yes		Yes	with POTW Permit Component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permit	POTW	Length of SSCS		This is the number of miles of pipe in the sanitary sewer collection system.	Yes		Yes		Yes	with POTW Permit Component
Narrative Conditions/ Permit Schedules										
Narr. Cond/Permit Schedule	Narr.Cond/ Schedule	Description		The unique code/ description that identifies the type of narrative condition.	Yes		Yes	Yes	Yes	
Narr. Cond/Permit Schedule	Narr.Cond/ Schedule	Narrative Condition Number	CSCH, VCSN, EVSN	This identifies a narrative condition and its elements uniquely for a permit.	Yes		Yes	Yes	Yes	System-generated for web users; RIDE for batch users.
Narr. Cond/Permit Schedule	Event	Schedule Date	DTSC, CVDT	The date on which a schedule event is due to be completed and against which compliance will be measured.	Yes		Yes	Yes	Yes	
Narr. Cond/Permit Schedule	Event	Actual Date	DTAC	The date on which the permittee achieved the schedule event.	No		Yes		Yes	
Narr. Cond/Permit Schedule	Event	Report Received Date	DTRC	The date on which the regulatory authority receives a report (generally a letter) from the permittee indicating that a Schedule Event was completed (e.g., Start Construction) or the required report was enclosed.	No		Yes		Yes	
Narr. Cond/Permit Schedule	Event	Event	EVNT, CVEV, EVEV	The code/ description indicating the particular event with which the permittee is scheduled to comply.	Yes		Yes	Yes	Yes	
Permitted Feature										
Permitted Feature	Basic Info	Application Design Flow (MGD)		The flow that a permitted feature was designed to accommodate, in MGD.	No		Yes		Yes	
Permitted Feature	Basic Info	Application Actual Average Flow (MGD)		The flow that a permitted feature actually had at the time of application, in MGD.	No		Yes		Yes	
Permitted Feature	Basic Info	Permitted Feature ID	DSCH, PLDS	The identifier assigned for each location at which conditions are being applied.	Yes		Yes		Yes	same as below
Permitted Feature	Basic Info	Master General Category ID	DSCH	The identifier assigned for each location at which conditions are being applied.	Yes			Yes		same as above
Permitted Feature	Basic Info	Type	OUTT	The code/ description indicating the type of permitted feature (e.g. External Outfall, Sum).	Yes		Yes	Yes	Yes	
Permitted Feature	Lat/Long	Latitude	PLAT	The measure of the angular distance on a meridian north or south of the equator for a Permitted Feature; stored in decimal degrees.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Permitted Feature	Lat/Long	Longitude	PLON	The measure of the angular distance on a meridian east or west of the prime meridian for a Permitted Feature; stored in decimal degrees.	No		Yes		Yes	except for permits with Storm Water - construction permitted features

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Permitted Feature	Lat/Long	Horizontal Accuracy Measure	PLLC	The measure of the accuracy (in meters) of the latitude and longitude coordinates.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Permitted Feature	Lat/Long	Reference Point	PLLD	The code/ description for the place for which geographic coordinates were established.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Permitted Feature	Lat/Long	Source Map Scale Number	PLLS	The number that represents the proportional distance on the ground for one unit of measure on the map or photo.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Permitted Feature	Lat/Long	Horizontal Collection Method	PLLM	The code/ description that represents the method used to determine the latitude and longitude coordinates for a point on the earth.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Permitted Feature	Lat/Long	Horizontal Reference Datum	PLLT	The code/ description that represents the reference datum used in determining latitude and longitude coordinates.	No		Yes		Yes	except for permits with Storm Water - construction permitted features
Limit Set										
Limit Set	Basic Info	Limit Set Designator	DRID, PLRD	The alphanumeric field that is used to designate a particular grouping of parameters within a limit set.	Yes		Yes	Yes	Yes	
Limit Set	Basic Info	Type		The unique code/ description identifying the type of limit set (i.e. Scheduled, Unscheduled).	Yes		Yes	Yes	Yes	System-generated for web users; RIDE for batch users.
Limit Set	Basic Info	Default Months Limit Set Applies	ALLP	The default months that the limit set applies. Defaults to all 12 months.	Yes		Yes	Yes	Yes	
Limit Set	Basic Info	Initial Monitoring Date	STRP	The date on which monitoring starts for the first monitoring period for the limit set; this date will be blank for Unscheduled Limit Sets.	Yes, except for unscheduled limit sets		Yes		Yes	
Limit Set	Basic Info	Initial DMR Due Date	STSS, STSU	The date that the first DMR for the limit set is due to the regulatory authority; this date will be blank for Unscheduled Limit Sets.	Yes, except for unscheduled limit sets		Yes		Yes	
Limit Set	Basic Info	Number of Report Units	NRPU	The number of months in the monitoring periods for the DMRs for the limit set (e.g., monthly = 1, semi-annually = 6, quarterly = 3).	Yes		Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Limit Set	Basic Info	Number of Submission Units	NSUS, NSUN	The attribute stores the number of months for submitting the DMRs for the limit set (e.g., monthly = 1, semi-annually = 6, quarterly = 3); this data element will be blank for Unscheduled Limit Sets.	Yes, except for unscheduled limit sets		Yes		Yes	
Limit Set	Basic Info	Compliance Tracking Status Start Date	PIDT	The date that the Limit Set Status started.	Yes		Yes		Yes	
Limit Set	Basic Info	Status	PIAC	The status of the Limit Set (i.e., Active or Inactive); Limit Sets will not have violations generated when a Limit Set is Inactive unless an Enforcement Action Limit is present.	Yes		Yes		Yes	Defaults to active
Limit										
Limit	Basic Info	Monitoring Location	MLOC	The code/ description of the monitoring location at which sampling should occur for a limit parameter.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Season Number	SEAN, ESEA	Indicates the season of a limit and is used to enter different seasonal limits for the same parameter within a single limit start and end date.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Start Date	ELSD, FLSD, ILSD, MLSD	The date on which a limit starts being in effect for a particular parameter in a limit set.	Yes		Yes	Yes	Yes	
Limit	Basic Info	End Date	ELED, FLED, ILED, MLED	The date on which a limit stops being in effect for a particular parameter in a limit set.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Change of Limit Status Indicator	COLS	The code/ description that describes circumstances affecting limits, such as formal enforcement actions or permit modifications.	No		Yes	Yes	Yes	System-generated for batch users; RIDE for web users.
Limit	Basic Info	Stay Type	CONP	The unique identifier of the type of stay applied to a limit (e.g., X, Y, Z), which indicates whether the limits do not appear on the DMR at all, are treated as monitor only, or have a stay value in effect during the period of the stay.	Yes		Yes		Yes	
Limit	Basic Info	Stay Start Date	PTEV (P7099), PTAC	The date on which a limit stay begins.	Yes, if Stay Type is entered		Yes		Yes	
Limit	Basic Info	Stay End Date		The date on which a limit stay is lifted.	No		Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Limit	Basic Info	Reason for Stay		The text that represents the reason a stay was applied to a limit.	Yes, if Stay Type is entered		Yes		Yes	
Limit	Basic Info	Stay Limit Value	MCMX, MCAV, MCMN, MQMX, MQAV	The numeric limit value imposed during the period of the stay for the limit; if entered, during the stay period, the system will use this limit value for calculating compliance rather than the actual limit value.	Yes, when Stay Type is "Z".		Yes		Yes	
Limit	Basic Info	Limit Type	OUTT	The code that indicates whether a limit is an enforceable or an alert limit (e.g., action level, benchmark) that does not receive effluent violations.	Yes		Yes		Yes	This defaults to an enforceable limit. The user can optionally change it to an alert limit.
Limit	Basic Info	Enforcement Action ID		The unique identifier for the Enforcement Action that imposed the Enforcement Action limit; this data element helps tie the limit record to the Final Order record in the database.	Yes		Yes		Yes	Only RIDE if the limit is an EA Limit.
Limit	Basic Info	Final Order ID	PLFN	The unique identifier for the Final Order that imposed the Enforcement Action limit; this data element ties the limit record to the Final Order record in the database.	Yes		Yes		Yes	Only RIDE if the limit is an EA Limit.
Limit	Basic Info	Eligible for Burden Reduction		The indication of whether a limit parameter is eligible for monitoring burden reduction.	Yes		Yes		Yes	Defaults to "no".
Limit	Basic Info	Modification Effective Date	PTEV, PTAC (PMDD)	The effective date of the permit modification that created this limit.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Modification Type		The type of permit modification that created this limit (e.g. major, minor, permit authorized change).	Yes		Yes	Yes	Yes	
Limit	Basic Info	Parameter	PRAM	The unique code/ description identifying the parameter being limited and/or monitored.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Months	ALLS (not WENDB)	The months that the limit applies. Defaults to limit set months.	Yes		Yes	Yes	Yes	
Limit	Basic Info	Value Type	LCMX, LCMN, LCAV, LQMX, LQAV	The indication of the limit value type (e.g., Quantity 1, Concentration 2).	Yes		Yes	Yes	Yes	System-generated for web users; RIDE for batch users.
Limit	Basic Info	Quantity Units / Concentration Units	LCUC, LQUC	The code/ description representing the unit of measure applicable to quantity or concentration limits as entered by the user.	No, except to save limit value.		Yes	Yes	Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Limit	Basic Info	Statistical Base Code	LCXS, LCAS, LCMS, LQXS, LQAS	The code/ description representing the unit of measure applicable to the limit and DMR values entered by the user (e.g., 30-day average, daily maximum) CHECK DATA STANDARD.	No, except to save limit value.		Yes	Yes	Yes	
Limit	Basic Info	Optional Monitoring Flag	LCMX/ LCMN/ LCAV/ LQMX/ LQAV (OPMON)	The flag allowing users to indicate that monitoring is optional but not required (i.e., effluent violation generation will be suppressed for optional columns).	Yes		Yes	Yes	Yes	Defaults to "no".
Limit	Basic Info	Qualifier		The unique code identifying the limit value operator (e.g. <= ,<,).	Yes		Yes	Yes	Yes	It defaults to "=".
Limit	Basic Info	Value	LCMX, LCMN, LCAV, LQMX, LQAV	The actual limit value number from the Permit or Enforcement Action Final Order.	No		Yes	Yes	Yes	
COMPLIANCE MONITORING DATA E										
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Activity Actual End Date	DTIN, DTIA	The actual date on which the Compliance Monitoring Activity ended.	Yes, if there is no planned end date	Yes	Yes		Yes	RIDE if Planned End Date not entered
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Activity Planned End Date	SIDT (not WENDB)	The planned date for the Compliance Monitoring Activity to end.	Yes, if there is no actual end date	Yes	Yes		Yes	RIDE if Actual End Date not entered
Compliance Monitoring Activity	Basic Info	State		The US Postal Service abbreviation that represents that state or state equivalent for the U.S.	Yes	Yes	Yes		Yes	States only - prepopulated based on user profile
Compliance Monitoring Activity	Basic Info	Compliance Activity Type		The unique code/ description that identifies a type of compliance event or enforcement action.	Yes	Yes	Yes		Yes	System-generated for batch users; RIDE for web users.
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Type	TYPI	The code/ description indicating the type of compliance monitoring activity taken by a regulatory Agency.	Yes	Yes	Yes		Yes	
Compliance Monitoring Activity	Basic Info	Bio-Monitoring Inspection Method		The unique code that identifies the type of biomonitoring inspection method. This data element supplements the Compliance Monitoring Category and Compliance Monitoring Type Inspection Type recorded for all inspections.	Yes, if "bio-monitoring" is entered as Compliance Monitoring Type	Yes	Yes		Yes	
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Category	TYPI	The unique code/ description identifying the compliance monitoring or inspection category code/ description.	Yes	Yes	Yes		Yes	System-generated for batch users; RIDE for web users.
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Action Reason		The unique code that identifies the purpose of an activity.	Yes	Yes	Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Compliance Monitoring Activity	Basic Info	Was this a State, Federal or Joint (State/Federal) Inspection?	INSP	The flag indicating if the inspection is a joint inspection of federal and state.	No	Yes	Yes		Yes	
Compliance Monitoring Activity	Basic Info	Compliance Monitoring Agency Type	INSP	Whether it's an EPA or State Inspection	Yes	Yes	Yes		Yes	
Compliance Monitoring Activity	Basic Info	Law Sections Violated	TYPI	The unique identifier for the Section(s) of law violated and cited in the activity.	No	Yes	Yes		Yes	
Compliance Monitoring Activity	CAFO	Designation Reason		If the facility was designated, indicate the reason the facility was designated, such as the amount of waste reaching waters, location, slope, rainfall, etc.	Yes, if "yes" is entered for "Is the Animal Facility a CAFO?" and "small" is entered for CAFO classification		Yes		Yes	with CAFO Permit Component
Compliance Monitoring Activity	CAFO	Animal: Type		The unique code/ description that identifies the operation''s applicable animal sector(s).	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Animal: Other (Please specify)		The free-form text field to describe the CAFO's applicable animal sector if Other is selected for Animal Type.	No		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "animal type".
Compliance Monitoring Activity	CAFO	Animal: Total Number		The total number of each type of livestock at the facility.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Containment: Type		The unique code/ description for the type of containment used by the operation.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Containment: Total Capacity		The total capacity, in gallons, of the containment structure.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Containment: Other		The free-form text field to describe the type of containment if Other is selected for Containment Type.	No		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "containment type".
Compliance Monitoring Activity	CAFO	CAFO Classification		The unique code/ description that identifies the how the facility was classified for a "Concentrated Animal Feeding Operation?" Options are Large, Medium and Small (Designation).	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	CAFO Designation Date		The date on which the facility is designated as a Concentrated Animal Feeding Operation (CAFO).	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Solid Manure or Litter Generated		The total amount of manure in tons generated annually by the facility.	No		Yes		Yes	with CAFO permit component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Compliance Monitoring Activity	CAFO	Solid Manure or Litter Transferred		The number of tons of manure or litter produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Liquid Manure or Wastewater Generated		The total amount of manure in gallons generated annually by the facility.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Liquid Manure or Wastewater Transferred		The number of gallons of manure or litter produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	NMP Developed Date		The date that an NMP was developed by the facility.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	NMP Last Updated Date		The date that the NMP was last updated by the facility.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Is the Animal Facility Type a CAFO?		The flag to indicate if the facility is classified as a CAFO or not.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Storage: Type		The unique code/ description that describes the type of storage used by the operation.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Storage: Other		The free-form text field to describe the type of storage used by the operation if the Other code is selected for storage type code attribute.	No		Yes		Yes	with CAFO Permit Component. Required only if "other" is selected under "storage type".
Compliance Monitoring Activity	CAFO	Days of Storage		The number of days of storage there were for each storage type selected.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CAFO	Storage Total Capacity Measure		The total capacity, in tons or gallons, of the storage structure.	No		Yes		Yes	with CAFO permit component
Compliance Monitoring Activity	CSO	Permitted Feature Identifier		The unique identifier for the permitted feature number entered by the user for the CSO.	Yes, if CSO Overflow Location Street Address or Lat/long info is not entered	Yes	Yes		Yes	with Law Section for CSO
Compliance Monitoring Activity	CSO	Location Street Address		The street address location of the overflow.	Yes, if Permitted Feature Identifier or Lat/long info is not entered	Yes	Yes		Yes	with Law Section for CSO
Compliance Monitoring Activity	CSO	Longitude		The measure of the angular distance on a meridian east or west of the prime. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if CSO Overflow Location Street Address or Permitted Feature Identifier is not entered	Yes	Yes		Yes	with Law Section for CSO

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Compliance Monitoring Activity	CSO	Latitude		The measure of the angular distance on a meridian north or south of the equator. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if CSO Overflow Location Street Address or Permitted Feature Identifier is not entered	Yes	Yes		Yes	with Law Section for CSO
Compliance Monitoring Activity	CSO	CSO Overflow Event Date		The date of the actual CSO overflow event.	Yes	Yes	Yes		Yes	with Law Section for CSO
Compliance Monitoring Activity	Pretreatment	SIUs	SIUS	The total number of SIUs.	Yes, if any compliance monitoring SIU information is entered.		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	SIUs Without Control Mechanism	NOCM	The number of SIUs for which a current control mechanism is required but not yet issued or has expired, as observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	SIUs Not Inspected	NOIN	The number of SIUs not inspected within the reporting year, as observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	SIUs Not Sampled	NINF	The number of SIUs not sampled within the reporting year, as observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	SIUs in SNC with Pretreatment Standards	SNPS (not WENDB), PSNC	The significant industrial users in SNC with pretreatment standards within the reporting year, observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	SIUs in SNC with Reporting Requirements	RSNC (not WENDB), PSNC	The significant industrial users in SNC with reporting requirements within the reporting year, as observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	CIUs	CIUS	The total number of CIUs.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	Pretreatment	Pass-Through/ Interference Indicator	PASS, INTF (not WENDB)	The flag indicating if there have been any incidents of pass-through or interference at the POTW within the reporting year, as observed during the program audit or PCI.	No		Yes			with Law Section for "CWA 301/307 - Effluent Limitations NPDES Toxic & Pretreatment Effluent…"
Compliance Monitoring Activity	SSO	Location Street Address		The street address location of the overflow event.	Yes, if Lat/long info is not entered	Yes	Yes		Yes	with Law Section for SSO
Compliance Monitoring Activity	SSO	Longitude		The measure of the angular distance on a meridian east or west of the prime. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if Location Street Address is not entered	Yes	Yes		Yes	with Law Section for SSO

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Compliance Monitoring Activity	SSO	Latitude		The measure of the angular distance on a meridian north or south of the equator. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if Location Street Address is not entered	Yes	Yes		Yes	with Law Section for SSO
Compliance Monitoring Activity	SSO	SSO Event Date		The date for which the SSO event is being reported.	Yes	Yes	Yes		Yes	with Law Section for SSO
DMR										
DMR	Basic Info	Permitted Feature	VDSC, EVDS	The identifier assigned for each location at which conditions are being applied.	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	Limit Set	VDRD, EVRD	The unique identifier tying the DMR form to its Limit Set record.	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	Parameter Code	VPRM, EVPR	The unique code/ description identifying the parameter reported on the DMR.	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	Monitoring Location	VMLO, EVML	The code/ description of the monitoring location at which the sampling occurred for a DMR parameter.	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	Monitoring Period End Date	MVDT	The date that the monitoring period for the values covered by this DMR form ends.	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	NODI	NODI	The unique code/ description that indicates the reason that “No Discharge” or “No Data” was reported in place of the DMR value.	No		Yes		Yes	
DMR	Basic Info	Value	MCMX, MCAV, MCMN, MQMX, MQAV	The DMR value number reported on the DMR form.	No		Yes		Yes	
DMR	Basic Info	Concentration Units/ Quantity Units	RCUN, RUNT (not WENDB)	The code/ description representing the unit of measure applicable to quantity or concentration limits and measurements as entered by the user on the DMR form.	No		Yes		Yes	
DMR	Basic Info	Value Received Date	DMRR (not WENDB)	The date the DMR value was received by the regulatory authority.	No		Yes		Yes	
DMR	Basic Info	Value Type	MCMX, MCAV, MCMN, MQMX, MQAV	The unique code/ description identifying a DMR value type (i.e. Quantity 1, Quantity 2, Concentration 1, Concentration 2, Concentration 3).	Yes		Yes		Yes	System-generated for web users; RIDE for batch users.
DMR	Basic Info	Qualifier	MCMX, MCAV, MCMN, MQMX, MQAV	The unique code identifying the DMR value operator (e.g., <, T, >, E, =). It defaults to "=".	Yes		Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
DMR	Biosolids - Incinerator	Compliance with National Emission Standard for Beryllium in 40 Code of Federal Regulations (CFR) Part 61		The flag indicating whether the facility is in compliance with the National Emission Standard for Beryllium in 40 CFR Part 61.	No		Yes		Yes	with Biosolids permit component and permitted feature type of incineration
DMR	Biosolids - Incinerator	Compliance with National Emission Standard for Mercury in 40 CFR Part 61		The flag indicating whether the facility is in compliance with the National Emission Standard for Mercury in 40 CFR Part 61.	No		Yes		Yes	with Biosolids permit component and permitted feature type of incineration
DMR	Biosolids - Land Application Site	Pollutant Table(s) Met		The code/ description identifiying the pollutant table in the biosolids regulations (i.e. 1-4) that was met by the facility for land application on this DMR.	No		Yes		Yes	with Biosolids permit component and permitted feature type of land application
DMR	Biosolids - Land Application Site	Does facility certify pathogen reduction for land application?		The flag indicating if the facility certifies pathogen reduction for surface disposal.	No		Yes		Yes	with Biosolids permit component and permitted feature type of land application
DMR	Biosolids - Land Application Site	Does the Facility certify Vector Attraction Reduction for land application?		The flag indicating if the facility certifies Vector Attraction Reduction (VAR) for surface disposal.	No		Yes		Yes	with Biosolids permit component and permitted feature type of land application
DMR	Biosolids - Surface Disposal	Does facility certify pathogen reduction for surface disposal?		The flag indicating if the facility certifies pathogen reduction for surface disposal.	No		Yes		Yes	with Biosolids permit component and permitted feature type of surface disposal
DMR	Biosolids - Surface Disposal	Does facility certify vector attraction reduction for surface disposal?		The flag indicating if the facility certifies Vector Attraction Reduction (VAR) for surface disposal.	No		Yes		Yes	with Biosolids permit component and permitted feature type of surface disposal
Violations										
Violation	Basic Info	NPDES ID	NPID	The activity ID of the permit to which the violation is associated.	Yes	Yes	Yes		Yes	
Violation	Basic Info	Violation Code	CVIO, MVIO, SVCD	The code/ description identifying which type of Violation has occurred (e.g., D80 = Required Monitoring DMR Value Non-Receipt, E90 = Effluent Violation, C20 = Schedule Event Achieved Late).	Yes	Yes	Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Violation	Basic Info	Single Event Violation Date	SVDT	The date of a Single Event Violation; it is only used for Single Event Violations.	Yes	Yes	Yes		Yes	
Violation	Basic Info	Single Event Start Date		If the single event violation ocurred over multiple days, the date the ocurrence began.	No	Yes	Yes		Yes	
Violation	Basic Info	Single Event End Date		If the single event violation ocurred over multiple days, the date the ocurrence ended.	No	Yes	Yes		Yes	
Violation	RNC	RNC Detection Code	SNCC, SNCE, SNCS	The type of RNC detected. It can be entered automatically by the system or it can be entered manually.	No	Yes	Yes		Yes	
Violation	RNC	RNC Detection Date	SNDC, SNDE, SNDS	The date that RNC was detected. It can be entered manually or automatically. In cases in which RNC is detected by ICIS — NPDES, the detection date entered will vary according to the type of violation detected.	No	Yes	Yes		Yes	
Violation	RNC	RNC Resolution Code	SRCC, SRCE, SRCS	The RNC status (i.e., noncompliant, resolved pending, waiting resolution, resolved) of the violation. It can be entered manually or automatically by the system.	No	Yes	Yes		Yes	
Violation	RNC	RNC Resolution Date	SRDC, SRDE, SRDS	The date RNC was marked to its current resolution status. It can be entered manually or automatically.	No	Yes	Yes		Yes	
Program Reports										

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Program Reports	Basic Info	Report Received/ Event Date:	PSED, DTRC	The date the report was received.	Yes		Yes		Yes	
Program Reports	Basic Info	NPDES ID	NPID	The unique identifier for an activity performed at or related to a particular site.	Yes		Yes		Yes	
Program Reports	Biosolids	Report Coverage End Date		The date that report coverage ends.	Yes		Yes		Yes	with Biosolids Permit Component
Program Reports	Biosolids	Number of Report Units		The number of months that the report covers.	Yes		Yes		Yes	with Biosolids Permit Component
Program Reports	CAFO	Animal Types		The unique code/ description that identifies the operation's applicable animal sector(s).	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Animal: Other		The free-form text field to describe the operation's applicable animal sector if Other is selected for Animal Type Code.	No		Yes		Yes	with CAFO Permit Component
Program Reports	CAFO	Total Number		The total number of each type of livestock at the facility.	No		Yes		Yes	with CAFO Permit Component
Program Reports	CAFO	Discharges During Year from Production Area		The flag indicating if there is any discharge from the production area during the year.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Solid Manure or Litter Generated		The total amount of manure in tons generated annually by the facility.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Liquid Manure or Wastewater Generated		The total amount of manure in gallons generated annually by the facility.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Liquid Manure or Wastewater Transferred		The number of gallons of manure or litter produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Solid Manure or Litter Transferred		The number of tons of manure or litter produced by the CAFO that will be transferred to other persons.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Does the facility have an NMP developed or approved by a certified planner?		The yes/no flag indicating whether the facility has Nutrient Manure Management Plan developed or approved by a certified planner.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	Total Number of Acres Identified by NMP		The number of acres the existing NMP covers.	No		Yes		Yes	with a CAFO Permit Component
Program Reports	CAFO	The total number of acres used for land application in past 12 months		The total number of acres used for land application in past 12 months.	No		Yes		Yes	with a CAFO Permit Component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Program Reports	CSO	Permitted Feature Identifier		The unique identifier for the permitted feature number entered by the user for the CSO.	No		Yes		Yes	with a CSO Permit Component
Program Reports	CSO	Location Street Address		The street address location of the overflow.	Yes, if Permitted Feature Identifier or Lat/long info is not entered	Yes	Yes		Yes	with a CSO Permit Component
Program Reports	CSO	Longitude		The measure of the angular distance on a meridian east or west of the prime. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if CSO Overflow Location Street Address or Permitted Feature Identifier is not entered	Yes	Yes		Yes	with a CSO Permit Component
Program Reports	CSO	Latitude		The measure of the angular distance on a meridian north or south of the equator. Entered in either Decimal Degrees or in Degrees Minutes Seconds; stored in decimal degrees.	Yes, if CSO Overflow Location Street Address or Permitted Feature Identifier is not entered	Yes	Yes		Yes	with a CSO Permit Component
Program Reports	Pretreatment	Pretreatment Performance Summary Start Date	PSSD	The date on which the Pretreatment Performance Summary Report starts.	Yes		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs		The total number of SIUs.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs Without Control Mechanism		The number of SIUs for which a current control mechanism is required but not yet issued or has expired, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Program Reports	Pretreatment	SIUs Not Inspected		The number of SIUs not inspected, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs Not Sampled		The number of SIUs not sampled, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs in SNC with Pretreatment Standards		The significant industrial users in SNC with pretreatment standards, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs in SNC with Reporting Requirements		The significant industrial users in SNC with reporting requirements, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Violation Notices Issued to SIUs	VINO (not WENDB), FENF	The number of formal notices of violation or equivalent actions that have been issued to SIUs. Notices do not include AOs (which are defined as a formal notice to the user of violations and requires specific actions with specific dates to address those violations. AOs may include penalties.)	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Administrative Orders Issued to SIUs	ADOR (not WENDB), FENF	The number of administrative orders issued to SIUs. An Adminstrative Order (AO) is defined as a formal notice to the user of violations and requires specific actions with specific dates to address those violations. AOs may include penalties.	Yes		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Civil Suits Filed Against SIUs	CIVL (not WENDB)	The number of civil suits filed against SIUs, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Criminal Suits Filed Against SIUs	CRIM (not WENDB), JUDI	The number of criminal suits filed against SIUs, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	CIUs		The total number of CIUs.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Pass-Through/ Interference Indicator		The flag indicating if there have been any incidents of pass-through or interference at the POTW in the past year, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Date of Most Recent Technical Evaluation for Local Limits		The date on which the Pretreatment Control Authority has technically evaluated the need for local limits.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Date of Most Recent Adoption of Technically Based Local Limits		The date of most recent approval of technically based local limits for pollutants by Pretreatment Approval Authority. If 1 or 2 local limits are updated at a time (on-going), the latest adoption date (approval) would be the date of the last approval, even if it was for only one pollutant.	No		Yes			with POTW and Pretreatment Permit Component

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Program Reports	Pretreatment	Local Limits Pollutants		This is the list of the pollutants for which local limits were derived, not at the outfall but at the headworks.	Yes, if a date is entered for Date of Most Recent Adoption of Technically Based Local Limits		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Removal Credits Application Status		The status of the application for removal credits.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Date of Most Recent Removal Credits Approval		This is the date the application for removal credits was approved.	Yes, if the Removal Credits Application Status is "approved".		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Removal Credits		This field contains a list of pollutants for which removal credits were granted.	Yes, if the Removal Credits Application Status is "approved".		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs in SNC Published in Newspaper	SVPU	The number of significant industrial users in SNC published in the newspapers, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	Industrial Users (IUs) from which Penalties have been collected	IUPN	Number of IUs (not SIUs) from which penalties have been collected, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
Program Reports	Pretreatment	SIUs in SNC with Pretreatment Schedule	SSNC	The number of Significant industrial users in SNC with pretreatment schedule, as reported on the annual report.	No		Yes			with POTW and Pretreatment Permit Component
ENFORCEMENT DATA ELEMENTS										
Enforcement Action	Basic Info	Enforcement Action Identifier	ERFN, CSFN	The number of the Enforcement Action; for a judicial action, the number as referred to by the Court where the action was filed. This number is also used to link compliance schedules to enforcement actions.	Yes	Yes	Yes		Yes	Only for Federal and State Formal Enforcement Actions
Enforcement Action	Basic Info	Forum	ENAC, EKAC	This is the legal forum in which the Enforcement Action is brought. For Administrative Formal, the action is brought before an administrative body or tribunal.	Yes	Yes	Yes		Yes	
Enforcement Action	Basic Info	Enforcement Action Type	ENAC	A description that uniquely identifies the type of enforcement action (i.e., civil judicial, bankruptcy). For administrative enforcement actions, the type is the statute section authorizing the action.	Yes	Yes	Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Enforcement Action	Basic Info	Programs Violated	ENAC	The code that identifies the program associated with an activity.	Yes, except for Federal actions	Yes	Yes		Yes	System-generated for Federal actions, required for all State actions.
Enforcement Action	Basic Info	Reason for deleting enforcement action		Reason for deleting enforcement action.	Yes, if deleting action.	Yes	Yes		Yes	Only for Formal Enforcement Actions
Enforcement Action	Basic Info	Violation Code	EVTP, ESVC, ECVC	The code/ description identifying which type of Violation has occurred (e.g., D80 = Required Monitoring DMR Value Non-Receipt, E90 = Effluent Violation, C20 = Schedule Event Achieved Late).	Yes	Yes	Yes		Yes	
Enforcement Action	Basic Info	Violation Date	EVMD, ECVD, ESVD	If there is a Single Event Violation, use Single Event Viuolation Date; if DMR reporting violation, use DMR Due Date; if DMR measurement violation, use Monitoring Period End Date; if Permit Schedule violation, use Permit Schedule Date; if a Compliance Schedule violation, use Compliance Schedule Date.	Yes	Yes	Yes		Yes	
Final Orders										
Final Orders	Basic Info	Final Order Type	ENAC, EKAC	A code/ description that uniquely identifies the regulatory instrument used by the EPA to settle the Enforcement Action.	Yes	Yes	Yes		Yes	Only for Formal Enforcement Actions
Final Orders	Basic Info	Violation Code	EVTP, ESVC, ECVC	The code/ description identifying which type of Violation has occurred (e.g., D80 = Required Monitoring DMR Value Non-Receipt, E90 = Effluent Violation, C20 = Schedule Event Achieved Late).	Yes	Yes	Yes		Yes	Only for Formal Enforcement Actions
Final Orders	Basic Info	Violation Date	EVMD, ECVD, ESVD	If there is a Single Event Violation, use Single Event Viuolation Date; if DMR reporting violation, use DMR Due Date; if DMR measurement violation, use Monitoring Period End Date; if Permit Schedule violation, use Permit Schedule Date; if a Compliance Schedule violation, use Compliance Schedule Date.	Yes	Yes	Yes		Yes	Only for Formal Enforcement Actions
Final Orders	Basic Info	Final Order Issued/ Entered Date	ENDT, EKDT	The civil case date the Final Order is signed by the presiding Judge and entered by the Clerk of the Court; it is the date the Clerk stamps on the document. For an Administrative Formal EA, this is the Final Order Issued Date; for a Judicial EA, this is the Final Order Entered Date.	No	Yes	Yes		Yes	Only for Formal Enforcement Actions
Penalties										
Penalty	Basic Info	Cash Civil Penalty Amount Required-By Statute	APAM APPA	For civil judicial Enforcement Actions, the dollar amount of the penalty assessed against the defendant(s) as specified in the final entered Consent Decree or Court Order. For Administrative Enforcement Actions, it is the dollar amount of the penalty assessed in the Consent/Final Order.	No	Yes	Yes		Yes	
Compliance Schedules										
Compliance Schedule	Schedule	Compliance Schedule Number	CSCH, VCSN, EVSN	A two-digit number which in combination with the Schedule Type and NPDES ID uniquely identifies a Compliance Schedule.	Yes	Yes	Yes		Yes	System-generated for web users; RIDE for batch users.
Compliance Schedule	Schedule	Schedule Descriptor		The code/ description indicating the type of Narrative Condition applies for the schedule.	No	Yes	Yes		Yes	

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Permit Type in ICIS-NPDES				Comment
						Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Compliance Schedule	Event	Schedule (Start) Date	DTSC, ERDT, CVDT	The date the event is scheduled to be occur (i.e., the due date).	Yes	Yes	Yes		Yes	
Compliance Schedule	Event	Actual Date	DTAC	The actual date on which the Compliance Schedule event occurred.	No	Yes	Yes		Yes	
Compliance Schedule	Event	Report Received Date	DTRC	The date the regulatory agency received the Compliance Schedule report.	No	Yes	Yes		Yes	
Compliance Schedule	Event	Schedule Event	EVNT, CVEV, EVEV	The unique code/ description that identifies the Compliance Schedule event.	Yes	Yes	Yes		Yes	
Milestones/ Sub-activities										
Milestones/ Sub-activities	Basic Info	Sub Activity Type	ENAC, ENST, APHR, APAP	A code/ description that uniquely identifies a type of sub activities and/or milestones in the lifecycle of an enforcement action, such as "complaint filed" or "action closed".	Yes	Yes	Yes		Yes	
Milestones/ Sub-activities	Basic Info	Actual Date	ENDT, APFO, ESDT, APPC, APAF	The date on which the milestone was achieved/sub activity was conducted.	No	Yes	Yes		Yes	

1. This column provides the PCS acronyms that correspond to each RIDE element. If blank, there is no known equivalent. Also, the PCS acronyms represent WENDB elements required in PCS, unless otherwise noted.

2. From the ICIS-NPDES Detailed Design Document (page 4-2): "Data elements are marked as system required when entry of the data element is required by ICIS-NPDES in order for a user to add a particular record into the system... If [system-]required data elements are not entered, ICIS-NPDES will reject the transaction."

3. From the ICIS 2.0 Users Guide (Permits section): "Unpermitted facilities are records established in ICIS to allow for tracking of activities (e.g., inspections and enforcement actions) that are associated with facilities that do not have [NPDES] permits. They may not contain narrative conditions, schedules, or limits." Data entry requirements do not apply to facilities covered by a state program that is "broader in scope" than the approved NPDES program (under 33 U.S.C. § 1342(b)). Except for SIUs in non-preatreatment cities, the facility, compliance monitoring, and enforcement data for unpermitted facilities is only RIDE if there has been a formal enforcement action, an administrative penalty order or an informal enforcement action that addressed SNC. For SIUs in non-pretreatment cities, RIDE is expected. Examples of unpermitted facilities include SSS satellite systems and AFOs that, after inspection, are determined to be CAFOs requiring a NPDES permit.

Note: This is a list of additional RIDE exclusively for federal users and should be entered *in addition to* the RIDE listed in Appendix 2a. This list does not yet include all federal data entry requirements.

Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Information Source	Regulatory Citation	Data Use	Permit Type in ICIS-NPDES				Comment
									Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
PERMIT DATA ELEMENTS													
Permit	Basic Info	Major/Minor Status Indicator	MADI	The flag to indicate if the permit is a major or minor. Initially system generated (defaults to Minor) and updatable only by HQ users.	Yes	Major Minor Rating Sheet	122.2/ CWA 301(d), 304(b), and 304(m)	NPDES universe inventory tracking/ NPDES Mgmt Report (PER)/ ECHO/ OTIS/ ANCR/ WL/ Accomplishments reporting /ELG Annual Review		Yes		Yes	Only EPA HQ can enter this field based on information provided to EPA.
Permit	Basic Info	Major/Minor Status Start Date	PTAC	The date that the Permit became its current Major/Minor status. Initially system-generated to match effective date and updatable only by HQ users.	Yes	Major Minor Rating Sheet	122.2	NPDES universe inventory tracking/ NPDES Mgmt Report (PER)/ ECHO/ OTIS/ ANCR/ WL/ Accomplishments reporting		Yes		Yes	Only EPA HQ can enter this field based on information provided to EPA.
Permit	CAFO	Number of Acres of Contributing Drainage from Production Area		This is the number of acres that are drained and collected in the production area.	No	App./ NOI/ Annual Report	122.23	To determine possibility of runoff from production areas		Yes		Yes	with CAFO Permit Component
COMPLIANCE MONITORING DATA E													
Compliance Monitoring Activity	Basic Info	Region		The code/ description that represents the EPA Region.	Yes	Inspection Form 3560	none	NPDES Mgmt Report (PER)/ ECHO/ OTIS/ Accomplishments reporting/ State Framework	Yes	Yes		Yes	Federal only
Compliance Monitoring Activity	Basic Info	If state, local, or tribal lead, did EPA assist?	INSP	The flag indicating whether the EPA assisted with an activity when either the state, local, or tribal agency was the lead.	No	Inspection Form 3560, ICDS	CWA 308	Accomplishments reporting	Yes	Yes		Yes	RIDE if "Compliance Monitoring Agency Type" is not "EPA".
Compliance Monitoring Activity	Basic Info	If Joint, what was the purpose of the participation of the other party?		The reason for joint inspection.	Yes	Inspection Form 3560, ICDS	CWA 308	Data QA	Yes	Yes		Yes	RIDE if "Was this a State, Federal or Joint(State/Federal) Inspection?" is "Joint (State/Federal)".
Compliance Monitoring Activity	Basic Info	Which party had the lead?	INSP	The flag indicating who is the lead of the joint inspection.	Yes	Inspection Form 3560, ICDS	CWA 308	ECHO/ OTIS/ WL/ Accomplishments reporting	Yes	Yes		Yes	RIDE if "Was this a State, Federal or Joint(State/Federal) Inspection?" is "Joint (State/Federal)".
Compliance Monitoring Activity	Basic Info	Federal Statute Violated		A code that uniquely identifies the law that is authorizing the activity or being violated.	Yes	Inspection Report	CWA 308	Accomplishments reporting	Yes	Yes		Yes	System generated for state.
Compliance Monitoring Activity	CAFO	Number of Acres of Contributing Drainage from Production Area		Number of acres from production area used for drainage.	No	App./ NOI; Inspection	122.23	Supports enforcement and compliance monitoring		Yes		Yes	with CAFO permit component
ENFORCEMENT DATA ELEMENTS													
Enforcement Action	Basic Info	Enforcement Action Name		The name assigned to the enforcement action by the lead attorney; generally the primary defendant's name is used as the enforcement name.	Yes, except for state actions	User-defined, can be facility name	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Federal only
Enforcement Action	Basic Info	Comments	ECM1-ECM10 (not WENDB)	The free-form textual comments entered by the user/ analyst to further describe the corresponding data in a sensitive field.	No	User-defined, based on enforcement action/ administrative record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Enforcement Action	Basic Info	Federal Statutes Violated		A code that uniquely identifies the law that is authorizing the activity or being violated.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Enforcement Actions
Enforcement Action	Basic Info	Law Sections Violated		The Section(s) of law violated and cited in the action.	Yes, except for State actions	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Enforcement Actions

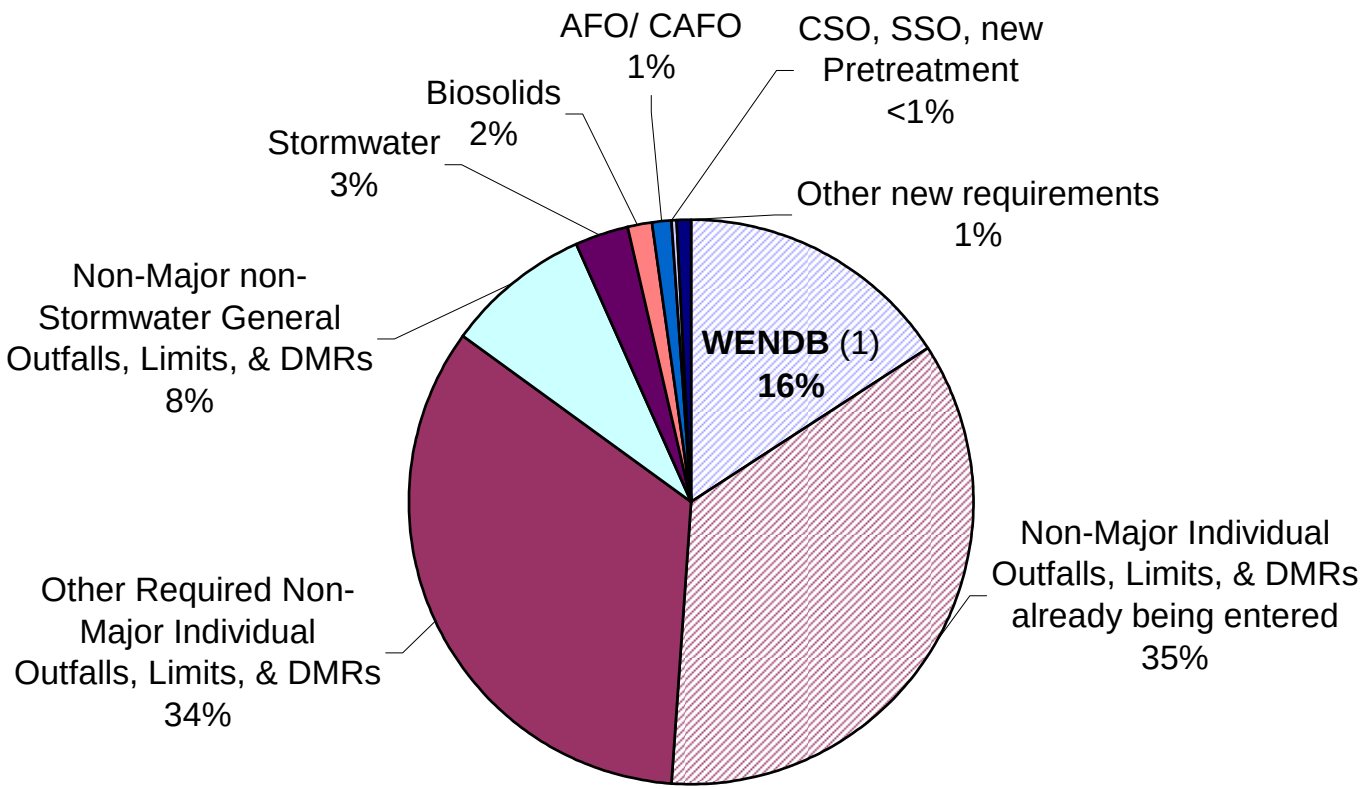
Area	Sub-Area	Data Element Name	PCS equivalent (if available)[1]	RIDE Data Element Description	System Required[2]	Information Source	Regulatory Citation	Data Use	Permit Type in ICIS-NPDES				Comment
									Unpermitted Facility[3]	Standard/ Individual/ Industrial User Permits & Associated Permit Records	Master General Permits	General Permit Covered Facility	
Enforcement Action	Basic Info	Priorities		A code that uniquely identifies the national or regional priority that prompted the initiation of an activity such as an inspection or enforcement action. Must enter National, Regional or Core.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Enforcement Action	Basic Info	Respondents/ Defendants		The name of the defendant, or respondent associated with the Enforcement Action.	Yes, except for State actions	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Enforcement Action	Basic Info	Summary / Non-Compliance or Corrective Action Description		The summary of the violation environmental problem and a description of the cause of action (basis of legal action). The summary could be extracted from the referral transmission memo or letter or it could be required as a first section of a revised standardized referral document.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Enforcement Action	Basic Info	Pollutants		The ICIS internal identifier for a substance.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions, for NPDES Violations only
Enforcement Action	Basic Info	Violation Type	EVTP	A unique code identifying the type of violation.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions, for NPDES Violations only
Enforcement Action	Gov contacts	Affiliation Type		The way that the contact is affiliated with the activity.	Yes, for Federal Formal Enforcement Actions	Enforcement Action/ Administrative Record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Affiliation Type "Lead Technical Contact" and/or "Lead Attorney" for Federal Formal Enforcement Actions
Enforcement Action	Gov contacts	First Name		The given name of an individual.	Yes, for Federal Formal Enforcement Actions	Enforcement Action/ Administrative Record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Affiliation Type "Lead Technical Contact" and/or "Lead Attorney" for Federal Formal Enforcement Actions
Enforcement Action	Gov contacts	Last Name		The surname of an individual.	Yes, for Federal Formal Enforcement Actions	Enforcement Action/ Administrative Record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Affiliation Type "Lead Technical Contact" and/or "Lead Attorney" for Federal Formal Enforcement Actions
Final Orders													
Final Orders	Basic Info	Final Order Name		The name of a final order associated with an enforcement action as assigned by the lead EPA attorney for federal actions.	Yes	User-defined, based on enforcement action/ administrative record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Final Orders	Basic Info	Respondents/ Defendants		The name of the defendant, or respondent, associated with the enforcement action.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Final Orders	Basic Info	Federal Statutes Violated		A code that uniquely identifies the law that is authorizing the activity or being violated.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions
Final Orders	Basic Info	Final Order Lodged Date		The date the settlement document is given to the clerk of the court for lodging in the district court; it is the date the clerk stamps on the document. (Federal judicial EA's only.)	Yes	Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Judicial Enforcement Actions when the subactivity type is "FOL".
Final Orders	Basic Info	Violation Type	EVTP	A unique code identifying the type of violation.	Yes	Enforcement Action/ Administrative Record	CWA Section 309	Accomplishments reporting	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions, for NPDES Violations only
Milestones/ Sub-activities													
Milestones/ Sub-activities	Basic Info	Enforcement Action Resolution Type		This is the mechanism by which the Enforcement Action is resolved.	Yes, when concluding an enforcement action.	Enforcement Action/ Administrative Record	CWA Section 309	Data QA	Yes	Yes		Yes	Only for Federal Formal Enforcement Actions, for NPDES Violations only

RIDE Data Entry Considerations by Program Area

Since January 2006, EPA and the States have been actively involved in renewed discussions which have included considerations regarding the expectations for data entry or transfer into ICIS-NPDES for each program area and possible phasing of selected data, particularly for non-major facilities. The Resources workgroup formed by the ICIS-NPDES Expanded Steering Committee produced a RIDE Data Entry Estimate Model, which was used to estimate RIDE data entry resources (in full-time equivalents [FTEs]) both nationally and for nine individual states. A brief synopsis of the national assumptions and results of the RIDE Data Entry Estimate Model for the various program areas is provided in the chart below, with the percent of total RIDE data entry based upon the RIDE Data Entry Model estimate. With the exception of pretreatment, PCS was not capable of providing sufficient information regarding these program areas.

Program Area	Estimated Universe	% of Total RIDE Data	Comments
Biosolids	6,000 sludge-only facilities	2%	Only seven States are currently authorized to implement the biosolids program.
Combined Sewer Systems (CSSs)	821 CSSs, with 8,924 combined sewer outfall locations	<1%	Number of CSSs varies considerably by State; the Single Event Violation Data Entry Guide (under development) will clarify data entry for overflows and overflow volumes.
Concentrated Animal Feeding Operations (CAFOs)	13,800 large or medium CAFOs with permits; 224,217 AFOS or CAFOs without permits	1%	States have indicated that some CAFO RIDE currently is not collected; there have been some implementation delays by certain States as they await development of new CAFO regulations (anticipated in 2007).
Pretreatment	1,464 approved local programs	Mostly WENDB in PCS; <1% for new non-WENDB	Most of these data elements were WENDB in PCS, but they were not well-populated by some States. RIDE are also expected to be entered or transferred into ICIS-NPDES for SIUs in non-pretreatment cities.
Separate Sanitary Sewer Systems (SSSs)	20,000 sanitary sewer overflows per year	<1%	For SSS satellite systems, RIDE is not expected to be entered or transferred into ICIS-NPDES unless the satellite has been issued a formal enforcement action, administrative penalty order, or an informal enforcement action which addresses the SSS significant noncompliance (SNC); the Single Event Violation Data Entry Guide (under development) will clarify data entry for overflows and overflow volumes.
Stormwater (SW)	280 Phase I MS4s, 7,500 Phase II MS4s, 100,000 Phase I SW industrial non-const., 10,000 Phase II SW industrial non-const., 100,000 Phase I SW const., 150,000 Phase II SW const.	3%	For SW construction sites, RIDE is not expected to be entered or transferred into ICIS-NPDES unless the facility has been issued a formal enforcement action, administrative penalty order, or an informal enforcement action which addresses the SW significant noncompliance (SNC) at the site; SW baseline reporting for SW industrial non-const. is not RIDE until NetDMR is available.

APPENDIX 3a: EPA RIDE Data Entry Model



Note: Full Circle represents 1.8 FTEs per State per year
(based on February 2007 revised model)

The striped slices reflect data that is being entered into PCS/ ICIS-NPDES now.

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APPENDIX 4, April 30, 2007 DRAFT

Key National Targets for Data in ICIS-NPDES

A phased transition period allows permitted authorities (States, Territories, Tribes and EPA Regions) to become familiar with the ICIS-NPDES system, make program adjustments if necessary, and initiate data entry or transfer of the RIDE into ICIS-NPDES. The transition period applies primarily to that RIDE for which WENDB equivalents did not exist in PCS. EPA recommends that States, Territories and Tribes develop transition plans to promote a timely and efficient move from PCS to ICIS-NPDES. The key national targets for data entry that should be incorporated into the transition plans for all current and prospective users of ICIS-NPDES are described below.

By August 1, 2007, all NPDES-authorized States, Territories and Tribes should begin to develop an ICIS-NPDES transition plan that includes a strategy to fully enter all RIDE within the target dates specified. The draft transition plan for each individual State, Territory and Tribe should be submitted no later than the deadlines stated below to the EPA Region for review and approval. Hybrid and non-direct (batch) users have been allocated four additional months to review the ICIS-NPDES XML schemas as they develop their transition plans. This also allows some phasing of the Regional workload to review these plans. EPA Regions which are responsible for direct implementation of the NPDES program in a non-authorized State or Tribal area shall submit their own transition plans to EPA Headquarters by December 1, 2007. EPA will review and approve adequate plans within three months of receipt.

Direct Users	Hybrid/ Batch Users	Target
8/1/2007	8/1/2007	- Begin development of ICIS-NPDES transition plans
12/1/2007	4/1/2008	- Submit State and Tribal transition plans to the EPA Regions for review and approval. (Regions that are developing transition plans for States and Tribes that are not authorized for the NPDES program will submit such plans to EPA HQ for review and approval.)
3/1/2008	7/1/2008	- Complete EPA review and approval of all transition plans for States, Tribes and EPA Regions.

In 2006 and 2007, EPA worked with the States -- via the Expanded Steering Committee, and its associated Resources and Matrix Workgroups -- to further refine the RIDE list and to closely examine key concepts associated with ICIS-NPDES. EPA has used the information and products from those efforts to develop the national data targets for the early years of implementation of the ICIS-NPDES Policy Statement. These national data targets (presented in the table below) should be incorporated into the transition plans for each State, Territory, Tribe or Region. The target dates in the table below apply to all States, with the understanding that all dates may be extended up to four months after a State migrates to ICIS-NPDES.

The transition plans should also ensure that data associated with non-DMR compliance monitoring (e.g., inspections), single event violations, enforcement actions, penalties and compliance schedules should be entered or transferred into ICIS-NPDES as those events occur (after migration from PCS to ICIS-NPDES). The transition plans should also ensure that appropriate linkages between the data for these compliance monitoring and enforcement items are also entered into ICIS-NPDES. In addition, the transition plans should ensure RIDE data entry or transfer to ICIS-NPDES is consistent with all requirements of Sections E, F, and G of this Policy Statement and with the RIDE list (in Appendix 2a; for Federal users, Appendices 2a and 2b). A transition plan template is provided in Appendix 5.

DETAILED TARGETS FOR STATES, TRIBES, AND REGIONS

By the dates below or within four months of migration to ICIS-NPDES (whichever is later), all users are expected to meet these national data targets.[1]

Target (these represent 98% data completeness unless otherwise specified)	**Majors**	**Individual Non-Majors**	**General Non-Majors[2]**
Facility/ Permit Information			
Basic Information - WENDB	8/1/2007		
Facility Latitudes/Longitudes[3]	8/1/2007	5/1/2008	5/1/2008
Special Program Area Permit Components[4] and other new (non-WENDB) RIDE	5/1/2008	12/1/2008	12/1/2009
Permitted Feature Data[3], Limit Sets, Limits and DMRs[5]			
Traditional Universe	8/1/2007	≥50% (with an emphasis on those facilities located in priority watersheds) by 9/1/2008. Enter data for remaining facilities 2 years after NetDMR is implemented	≥25% (with an emphasis on those facilities located in priority watersheds) by 9/1/2009. Enter data for remaining facilities 3 years after NetDMR is implemented.
Stormwater Industrial permits	N/A	N/A	12/1/2009
Biosolids	5/1/2008	12/1/2008	12/1/2009
Narrative Conditions (Permit Schedules were WENDB for majors)	8/1/2007	No later than 8/1/2010	No later than 8/1/2010
Inspections			
Traditional Universe (i.e., traditional majors and non-majors, excluding wet weather program areas) and Pretreatment – (were WENDB in PCS) Special Program Areas	Entered as they occur		
Violations			
Permit/ Compliance Schedule and DMR violations	System-generated based on data		
Single Event Violations	Entered as they occur		
Program Reports			
Existing WENDB (Pretreatment)	8/1/2007	8/1/2007 [6]	N/A
New Special Program Areas (Biosolids, CAFOs, CSOs)	No later than 8/1/2010		
Enforcement Actions (Were WENDB for majors)	Entered as they occur		

1 EPA may revise these dates for batch and hybrid users to address any unforeseen issues related to the finalization of the ICIS-NPDES XML schema by the Integrated Project Team.

2 RIDE for facility, permit, compliance monitoring, violations and enforcement data for SSS satellites and Stormwater-Construction sites is not expected except if the State or Tribe issues a formal enforcement action, administrative penalty order, or other informal enforcement action which addresses the stormwater SNC. In this case, the data should be entered as the events occur.

3 If this locational data (latitude, longitude, source map scale number, horizontal accuracy measure, horizontal collection method, horizontal reference datum, and reference point) currently are not collected, the permitting authority may wait until permit reissuance to enter or transfer this particular data.

4 These special program area elements apply to CAFOs, Biosolids, CSOs, Pretreatment, POTW, and Storm Water facilities.

5 Note that some permits do not have DMR requirements; for these permits, limit, limit set, and DMR data entry will not be necessary.

6 Pretreatment Performance Summary Data is currently WENDB for major facilities and for minor facilities that are PL 92-500 Construction Grant recipients.

APPENDIX 5, April 30, 2007 DRAFT

Template for a Transition Plan

As described in Sections F and G of this Policy Statement, the transition plan and target schedule for authorized States, Territories and Tribes will be reviewed and approved by EPA Regions at the Division Director level (Enforcement and Water) within three months of submission to EPA. Similarly, transition plans and target schedules for non-authorized States, Territories or Tribes will be reviewed and approved by EPA Headquarters within three months of Regional submission.

The transition plans should include the following information:

I. Name of State/Territory/Tribe/Region: _____

II. Type of User: _____ Direct _____ Non-direct _____ Hybrid/Combination
(If hybrid/combination, please provide short explanation).

III. Number of facilities in each of these categories:

Traditional majors	Traditional individual non-majors	Traditional general-permitted non-majors	Biosolids	CAFOs	Approved pretreatment programs	SIUs in non-pretreatment cities	CSSs	SSSs	MS4s	Non-construction industrial stormwater sites	Stormwater construction sites (annually)

IV. Strategy/Approach:
Provide a short description of the State, Territorial, Tribal or Regional plan for meeting national RIDE reporting targets in ICIS-NPDES within the transition period. Each of the following items should be covered in the strategy description:

A. Overall implementation strategy: by permit type, by watershed, by prioritization of minors, other;
B. Gap analysis to determine areas where RIDE currently are not collected or not available electronically (To assist in this effort, EPA will generate a report to indicate how well-populated the various WENDB data elements are in PCS);
C. Description of business processes that need to be changed to address data gaps and to ensure that RIDE flows to ICIS-NPDES. How will this be done? Will data entry be centralized? Will spreadsheets or other tracking be phased into ICIS?
D. If non-direct users or hybrid/combination users, description of changes needed to be made to the data system of the State, Territory or Tribe;

E. Incorporation of national data entry targets (as identified in Appendix 5) into the strategy and the schedule;
F. Description of the amount of grant money that has been made available to the State, Territory or Tribe for the transition from PCS to ICIS-NPDES and which activities are to be accomplished with the grant money;
G. Description of additional training or equipment that may be necessary;
H. Description of impacts on other data systems within the State, Territory or Tribe; and
I. Description of quality assurance (QA) procedures that will be used to ensure data quality and timeliness.

V. Schedule:

This schedule should be developed with reference to Appendix 4 of the Policy Statement (Key National Targets for Data in ICIS-NPDES). The schedule should include key targets for RIDE data entry, national data entry targets and data system modifications necessary to directly use, link or transfer data to ICIS-NPDES.

Within the national data entry targets, the permitting authority has flexibility in the prioritization approach that is used for data entry or data transfer to ICIS-NPDES. One option for prioritizing RIDE data entry or transfer into ICIS-NPDES is to prioritize data entry for facilities located in priority watersheds; this approach is particularly encouraged in the possible phasing of the data entry of DMRs for non-major facilities (as discussed in Section F of the Policy Statement). Another prioritization option would use permit components for specific program areas, such as CSSs, SSSs, pretreatment, biosolids, stormwater-MS4s, stormwater-industrial (non-construction), stormwater-construction and CAFOs. Another approach would be to enter all available RIDE data for facilities covered by major individual permits, then those covered by non-major individual permits, non-stormwater general permits and stormwater general permits. Although States, Territories or Tribes may exercise flexibility regarding which program areas or permit types are made available in ICIS-NPDES first, any such prioritization effort should still ensure that national data targets are met.

As an example, the attached table is a suggested format for a Data Entry Schedule Chart to be included in the Transition Plan for each State, Territory, Tribe or Region if using a permit type prioritization for RIDE data entry or transfer into ICIS-NPDES:

DATA ENTRY SCHEDULE CHART: DETAILED TARGETS

Target (these represent 98% data completeness unless otherwise specified)	**Majors**	**Individual Non-Majors**	**General Non-Majors**
Facility/ Permit Information			
Basic Information – (expected to be available without delay; WENDB data migrated from PCS)			
Facility Latitudes/Longitudes			
Special Program Area Permit Components and other new (non-WENDB) RIDE			
Permitted Feature Data, Limit Sets, Limits and DMRs			
Traditional Universe			
Stormwater Industrial permits			
Biosolids			
Narrative Conditions *(Permit Schedules)(were WENDB for majors)*			
Inspections			
Traditional Universe and Pretreatment – (historical data will be migrated from PCS, where such data was WENDB)			
Special Program Areas			
Violations			
Permit/ Compliance Schedule and DMR violations			
Single Event Violations			
Program Reports			
Existing WENDB (Pretreatment)(not a new requirement)			
New Special Program Areas (Biosolids, CAFOs, CSOs)			
Enforcement Actions *(previously was WENDB for majors only)*			

VI. Resources:

Explain resource implications, in terms of staffing, training, other support as well as anticipated cost savings from electronic reporting. States are encouraged to use the RIDE Data Entry Estimate Model to estimate annual ICIS-NPDES data entry resources for the State. To the extent known, explain how these resource estimates may shift over the initial few years.

VII. Linkages

For hybrid or non-direct users, provide sufficient detail as to what data will be directly entered into ICIS-NPDES (if any), and what data will be shared or transferred to ICIS-NPDES using ICIS-NPDES XML schema, including any phasing of data exchanged and frequency. In addition, the transition plan should clearly indicate what measures will be taken to ensure that entry of associated linkages between permits, inspections, violations and enforcement data will occur and be present in ICIS-NPDES.

VIII. Contacts

Identify key system contacts, including: system administrator; data steward; data entry personnel; responsible manager; other agency contacts. Please specifically identify the key contact regarding the development and implementation of the transition plan.

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Key ICIS-NPDES Roles and Responsibilities

Defining and maintaining clear roles and responsibilities are essential to managing a decentralized database such as ICIS-NPDES. The table below summarizes key management responsibilities for each group (NPDES-authorized States, Territories and Tribes, EPA Regions, OECA, OW, and OEI) in maintaining a successful system.

Authorized State, Territory or Tribe

1. Attend ICIS-NPDES User Group meetings and conference calls;
2. Develop transition plan and work with the Region during the review process;
3. Enter or transfer data to ICIS-NPDES pursuant to the standards set forth in Sections E, F and G of this Policy Statement, in the RIDE list and in the approved transition plan;
4. Have complete, accurate RIDE data in ICIS-NPDES within the approved transition period;
5. Ensure data quality in ICIS-NPDES;
6. Establish, maintain and implement clear ICIS-NPDES management agreements;
7. Identify System Administrator and Data Steward;
8. Manage users within the State, Territory or Tribe;
9. Identify training needs for users within the State, Territory or Tribe;
10. Manage, research and correct reported data issues; and
11. Work closely with Regional and OECA/ OW representatives including participating in ICIS-NPDES workgroups and in major decisions related to ICIS-NPDES through the system governance bodies.

EPA Region

1. Attend ICIS-NPDES User Group meetings and conference calls as needed;
2. Develop transition plans for non-authorized States, Territories and Tribes; work with Headquarters during the review process;
3. Enter data pursuant to the standards set forth in Section E of this Policy Statement, in the Federal RIDE list and in the approved transition plan;
4. Enter NPDES data for non-authorized States, Territories and Tribes in accordance with Sections E, F and G of this Policy Statement and have complete RIDE data in system within the approved transition period;
5. Ensure data quality in ICIS-NPDES;
6. Monitor and supplement data entry from States, Territories and Tribes, if necessary;
7. Review and approve transition plans;
8. Review and approve transition plans;
9. Establish, maintain and ensure implementation of clear ICIS-NPDES management agreements with States, Territories or Tribes, incorporating such agreements into PPAs or similar documents;
10. Identify System Administrator and Data Steward;
11. Train and manage users;
12. Manage, research and correct reported data issues;
13. Work closely with Regional and OECA/ OW representatives including participating in ICIS-NPDES workgroups and in major decisions related to ICIS-NPDES through the system governance bodies; and
14. Provide a source of ICIS-NPDES technical assistance and training.

OECA

1. Request appropriate resources to support ICIS-NPDES;
2. Operate and maintain ICIS-NPDES;
3. Evaluate and improve ICIS-NPDES to better ensure customer satisfaction;
4. Provide programmatic knowledge and experience;
5. Assert leadership in ensuring that compliance and enforcement information is kept current and complete by States, Territories, Tribes and Regions;
6. Resolve issues;
7. Maintain ICIS governance process;
8. Organize national meetings and conference calls;
9. Work closely with OW and Regional, State, Territorial and Tribal representatives and associations on major decisions related to ICIS-NPDES;
10. Manage user contact lists, sensitive data access, RNC and DMR non-receipt flags, and develop guidance and reference tables;
11. Monitor State-Region, Territory-Region and Tribe-Region ICIS-NPDES management agreements;
12. Review and approve transition plans submitted by Regions for non-authorized States, Territories and Tribes; and
13. Secure and provide training for use of ICIS-NPDES.

OW

1. Work with OECA to ensure the availability of adequate resources;
2. Monitor State-Region, Territory-Region and Tribe-Region ICIS-NPDES management agreements;
3. Review and approve transition plans submitted by Regions for non-authorized States, Territories and Tribes;
4. Provide programmatic knowledge and experience;
5. Participate in ICIS-NPDES governance bodies;
6. Assert leadership in ensuring permit information is kept current and complete by States, Territories, Tribes and Regions;
7. Resolve issues; and
8. Work closely with OECA, Regional, State, Territorial and Tribal representatives and associations, including participating in ICIS-NPDES workgroups and in major decisions related to ICIS-NPDES.

OEI

1. Work with OECA to ensure the availability of adequate resources;
2. Manage Exchange Network, ICIS-NPDES XML schema, security protocols, and data standards (including locational and facility data standards);
3. Work closely with OECA, OW, Regional, State, Territorial and Tribal representatives on major decisions related to ICIS-NPDES; and
4. Assist in data exchange between States, Territories, Tribes and EPA.

APPENDIX 7a, April 30, 2007 DRAFT

Definitions of Terms

Authorized State or Tribe
For the purposes of this document, an authorized State or Tribe is a State or Tribal government which has received NPDES permitting authority from EPA.

Batch data entry
Batch data entry in ICIS-NPDES is the transmission of eXtensible Markup Language (XML) data files through the Central Data Exchange into ICIS-NPDES. For comparison, in PCS, batch data entry occurred via upload of fixed format data files to the mainframe.

Core data
Core data refers to the RIDE information associated with facility, permit, compliance monitoring, and enforcement data types.

Data element
A specific field or column name in ICIS-NPDES or PCS that contains information when data is entered.

Direct data entry
This refers to manual data entry by key punching, often in the case where the State, Tribe or EPA Region is using PCS or ICIS-NPDES as their primary NPDES data management system.

Direct user State or Tribe
In an NPDES program implemented by an authorized State or Tribe which will use ICIS-NPDES to manage the NPDES program, direct users manually enter data into ICIS-NPDES through the keyboard into web screens.

Hybrid State or Tribe
In an NPDES program implemented by an authorized State or Tribe which will use ICIS-NPDES to manage the NPDES program, hybrid users manually enter some of the data (usually non-DMR data) into ICIS-NPDES through the keyboard into web screens. They also electronically transfer the rest of the data (usually DMR data) into ICIS-NPDES; this electronic method of data entry will likely increase, especially with the availability of eDMR (electronic DMR) tools, such as NetDMR.

ICIS
The acronym ICIS stands for the Integrated Compliance Information System, developed by EPA to serve as a national multi-media data system.

Major
A major facility is defined as follows: a major municipal facility has a flow of 1 million gallons per day or greater, a service population of 10,000 or greater or a significant impact on water quality; industrial facilities are considered major facilities based on a rating system that allocates points in various categories, including flow, pollutant loadings and water quality factors. EPA Regions, States and Tribes also have the discretion to identify other facilities as major facilities due to environmental concerns.

Non-direct user State or Tribe
Such a State or Tribal NPDES program uses another software system, besides ICIS-NPDES, to manage the NPDES program and only ensures that data is entered or transferred to ICIS-NPDES and is available to satisfy national reporting responsibilities and national program management needs. These States and Tribes are expected to rely heavily on electronic transfer (batch) using CDX and the Exchange Network, but may also use keyboard data entry for some purposes, particularly if the State or Tribe database has not been modified to include all RIDE.

Non-major
The universe of facilities regulated under the NPDES program that are not "major"facilities. Non-major facilities can also be referred to as "minor" facilities, although this does not denote a less important status.

PCS
The acronym PCS stands for the Permit Compliance System, which served as the national database of record for the NPDEs program since 1985.

Program components
Program components refer NPDES permit requirements associated with particular program areas. In ICIS-NPDES, a group of data elements are available to users to track program-specific data on Publicly-Owned Treatment Works (POTWs), Combined Sewer Overflows (CSOs), Sanitary Sewer Overflows (SSOs), Pretreatment, Biosolids, Stormwater, and Concentrated Animal Feeding Operations (CAFOs).

RIDE
The acronym RIDE stands for the Requisite ICIS-NPDES Data Elements, defined as the essential national information needed from NPDES-authorized agencies for EPA to meet the national NPDES national program management, oversight and reporting needs.

Single event violation
A Single Event Violation is a violation of a NPDES permit or regulatory requirement that is observed or determined by the permitting authority (EPA Region or authorized State/ local/ tribal government), and is distinct from violations that are system-generated (e.g., effluent limit violations arising from DMR submission, DMR non-receipt or compliance schedule violations). An unauthorized bypass or discharge, a violation detected during an inspection, a narrative violation description reported on a DMR, and a pretreatment violation are examples of Single Event Violations.

System-required data
Key data elements that are necessary in order to submit information or proceed to the next screen in ICIS-NPDES.

WENDB
The acronym WENDB stands for the Water Enforcement National Data Base data elements, identified as the required data elements in the Permit Compliance System (PCS), which served as the national database of record for the NPDES program since 1985.

Wet weather sources
These are non-traditional NPDES sources which include storm water runoff from industrial and municipal sectors, discharges from concentrated animal feeding operations (CAFOs), and overflows from combined and sanitary sewer systems (CSOs and SSOs). Such sources have been a program priority for EPA's enforcement and compliance program since 1998.

APPENDIX 7b

Definition of Acronyms

CAFO - Concentrated Animal Feeding Operation

CDX - Central Data Exchange

CFR - Code of Federal Regulations

CSO - Combined Sewer Overflow

CSS – Combined Sewer System

DMR - Discharge Monitoring Report

ECHO - Enforcement and Compliance History Online

ICIS - Integrated Compliance Information System

MS4 - Municipal Separate Storm Sewer System

NPDES - National Pollutant Discharge Elimination System

OC – EPA's Office of Compliance

OECA - EPA's Office of Enforcement and Compliance Assurance

OEI - EPA's Office of Environmental Information

OW - EPA's Office of Water

PCS - Permit Compliance System

POTW - Publicly-Owned Treatment Works

RIDE - Requisite ICIS-NPDES Data Elements

RNC - Reportable Non-Compliance according to 40 CFR §123.45

SNC - Significant Non-Compliance according to 40 CFR §123.45

SSO - Sanitary Sewer Overflow

SSS – Sanitary Sewer System

WENDB - Water Enforcement National Data Base

XML - eXtensible Markup Language

THE AIR FACILITY SYSTEM (AFS) BUSINESS RULES COMPENDIUM

This compendium was initially compiled in 2003 via the collaborative efforts of the EPA, its Regions and users of AFS. It is intended to be a living document, to change when the air compliance/enforcement program changes, and when the AFS changes.

VERSION 4.1-- August 2009

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THE OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE
OFFICE OF COMPLIANCE
ENFORCEMENT TARGETING & DATA DIVISION
DATA INFORMATION SYSTEM MANAGEMENT BRANCH
MEDIA SYSTEMS AND SUPPORT SECTION

AFS Business Rules, Version 4.1
August 2009

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RECORD OF DOCUMENT CHANGES

Revision #	Date	Summary of Changes/Additions
0	July 2004	Initial release of the document
1	July 2005	Update: Complete replacement
2	July 2006	Various grammatical and editorial updates were made throughout the compendium. In addition, content updates also were completed and the following sections have been changed: Section 2, 3B1, 3B2, and 3C11, along with the addition of Section 4 and Subsections: 3C17, and 3C18. All appendices were updated with new additions of appendices 3b, 3c, 4, 5, & 6.
3	Aug 2007	Update: Complete replacement. Correction-"Receipt of Stack Test Report" action type as a Discovery Date action versus PCE, page 44. Addition of Section 15, Dropped HPV Cases, page 56.
3.1	Sep 2007	Update: Additional HPV Discovery Date action type of TV ACC Due/Received, reference pages 49, 51, 52.
4.0	Mar 2009	Updated MDR Table page 6, new CMS categories for Tribal sources page 11, new CMS Fixed reports page 15, historic CMS category codes page 16, updated archive rule page 18, added new TIP air program code page 24, moved compliance status value 7 to out of compliance values page 27-28, new optional stack test actions page 36, included new HPV enhancements and retrievable acronyms pages 44, added federal Air Toxics Initiative page 65, added AFS Utilities schedule Appendix 9, updated all appendices. Updated listing of allowable duplicate action types (5/22/09)
4.1	Aug 2009	Added contingency planning documentation to security section (section 4) and AFS contacts list (section 8). Addition of Appendix 10: AFS Contingency Planning Data Entry Form

INTRODUCTION

In July of 2003 at the National AFS Workshop in Chicago, IL, draft AFS Business Rules were introduced to all participants. These draft Business Rules are to become the documentation for how data is reported and used in AFS.

During the summer and into the fall of 2003, teleconferences with all ten EPA Regions and interested state and local participants were held to review each page and each record of the documents. Definitions were fleshed out and descriptions added resulting from the conversations held. An average of four, one-hour conference calls were held with each Region. The resulting document was provided to the Air Branch Chiefs for comment, review and approval.

The information documented in the Business Rules will be used for three important purposes: to provide all users of the Air Facility System (AFS) with a guide for the interpretation of data fields, to complete a Closeness of Fit Analysis (COFA) with the Integrated Compliance Information System (ICIS) in a modernization effort; and for further integration with the Agency's multi-media information in systems like the Online Targeting and Information System (OTIS) and the Enforcement Compliance History Online (ECHO) system.

Suggestions for changes or additions to the compendium (please refer to Appendix 8 for an optional form to be filed out to aid in submitting comments and updates to the compendium) can be forwarded to:

- An Regional AFS Compliance Manager
- The AFS Helpline, Voice 1-800-367-1044, FAX 860-278-2400, or email to AFShelpline@trcsolutions.com
- AFS System Administrator, Betsy Metcalf, Voice 202-564-5962, FAX 202-564-0032, or email to metcalf.betsy@epa.gov
- AFS Security Manager, Akachi Imegwu, Voice 202-564-0045, Fax 202-564-0032, or email to imegwu.akachi@epa.gov

Suggestions for changes/additions will be distributed among the Regional AFS Compliance Managers for comment, and then reviewed in the AFS Configuration Control Board. After approval by the Board, the compendium will be updated.

SECTION 1: CURRENT MINIMUM DATA REQUIREMENTS (MDRs)

The Clean Air Act (CAA) describes in detail the reporting requirements for agencies authorized with delegation. EPA maintains several databases that track Air Compliance and Enforcement activity. AFS is the national repository for air stationary source surveillance and state enforcement activity. It maintains a universe of sources considered "Federally Reportable". Federally Reportable sources are those which exceed (Major Sources) or have the potential to exceed (Synthetic Minor Sources) a pollutant's major emission threshold; operating Part 61 National Emission Standard for Hazardous Air Pollutant (NESHAP) sources regardless of emission level, sources identified within the Compliance Monitoring Strategy (CMS) plan, any facility with a formal enforcement action, and any facility with an active HPV. See also Appendix 7, Acronyms Used in this Document, for the definition of air program acronyms.

Every three years, an effort to document reporting requirements and measure the cost of data maintenance is completed. The "Information Collection Request (ICR)" is an identification of information collected by the Air Compliance and Enforcement community for support of the program. The most recent ICR can be found on the AFS Web Page at: http://www.epa.gov/compliance/data/systems/air/afssystem.html

The ICR provides a table of Minimum Data Requirements (MDRs). The following information provides a version of that document:

TABLE 1
SUMMARY OF NATIONAL MINIMUM DATA REQUIREMENTS (MDRs) FOR CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE

Note: Unless otherwise noted, both Regions and states/locals report their data. The reportable universe of facilities for AFS includes: Major, Synthetic Minor and Part 61 NESHAP Minor facilities, other facilities identified within the CMS Evaluation Plan, any facility with a formal enforcement action and any facility with an active HPV. Facilities with formal enforcement actions (administrative orders, consent decrees, civil or criminal referrals and actions) should be tracked in AFS until the resolution of the violation, regardless of classification. If a minor source is included in the CMS universe, has a current enforcement action of <3 years old, or is listed as a discretionary HPV, it is considered reportable to AFS. Individual regional/state agreements are not superseded by this listing.

Identification	**AFS Acronym**
1. Facility Name	PNME
2. State	STAB/STTE
3. County	CNTY
4. Facility Number	PCDS
5. Street	STRS
6. City	CYNM
7. Zip Code	ZIPC
8. SIC or NAICS Code	SIC1/NIC1
9. Government Ownership	GOVT
10. HPV Linkage and Key Action (Day Zero)	Linked from Action Data
Compliance Monitoring Strategy (CMS)	
11. CMS Source Category	CMSC
12. CMS Minimum Frequency Indicator	CMSI

Note: Generally EPA enters these fields into AFS; state/locals provide this information per agreement with the EPA Region. An EPA Region may delegate data entry rights to a state/local agency.

All Regulated Air Program(s) [Note: All applicable air programs should be reflected at the plant level of AFS.]	
13. Air Program	APC1
14. Operating Status	AST1
15. Subparts for NSPS, NESHAP and MACT	SPT1

Note: Any applicable subpart for the NSPS, NESHAP or MACT air program at major and synthetic minor sources, minor source NESHAP and all other facilities reported as MDR. Reporting of minor source NSPS and MACT subparts are optional but recommended.

Regulated Pollutant(s) within Air Program(s)	
16. Pollutant(s) by Code or Chemical Abstract Service Number	PLAP/CAPP
17. Classification(s): EPA/ST	ECLP/SCLP

18. Attainment Status: EPA/ST EATN/SATN
19. Compliance Status: EPA/ST ECAP/SCAP

Actions Within Air Programs (includes Action Number, Type, Date Achieved)

20. Minimum Reportable Actions:
    - Informal Enforcement Actions: Notice of Violation(s)
    - Formal Enforcement Actions: Administrative Order(s) and Assessed Penalties, Consent Decrees and Agreements, Civil and Criminal Referrals, Civil and Criminal Actions
    - HPV Violation Discovered: Linked actions are FCEs, PCEs, Stack Tests (Observed or Reviewed), Title V Annual Compliance Certifications, Stack Test Notification Receipt
    - HPV Addressing Actions: Linked actions include but are not limited to State/EPA Civil or Criminal Referrals, State/EPA Civil or Criminal Actions, Administrative Orders, Consent Decrees, Source Returned to Compliance by State/EPA with no Further Action Required.
    - HPV Resolving Actions: Linked actions include but are not limited to Violation Resolved, Closeout Memo Issued, Source Returned to Compliance by State/EPA with no Further Action Required.
    - Full Compliance Evaluations (On or Off Site)
    - Stack Tests: Pass/Fail/Pending codes (PP/FF/99) are reported in the results code field, pending codes must be updated within 120 days.
    - Title V Annual Compliance Certification Due/Received: Reported by EPA unless otherwise negotiated. The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the "Title V Annual Compliance Certification Due/Received by EPA" action, and is not enforcement sensitive.
    - Title V Annual Compliance Certification Reviewed: Includes Results Codes for Annual Compliance Certification reviews: in compliance (MC), in violation (MV) and unknown (MU). Annual Compliance Certification deviations(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated).
    - Investigations: EPA Investigation Initiated (started) and State/EPA Investigation Conducted (finished). State Investigation Initiated is added for optional use. EPA and State Investigation Initiated (started) action types are enforcement sensitive.

Additional Action Information:

21. Results Code RSC1

Note: Pass/Fail/Pending (PP/FF/99) codes are reported for Stack Test actions. Compliance Results Codes of "In Compliance (MC), In Violation (MV), or Unknown (MU)" are entered for Title V Annual Compliance Certification reviews.

22. RD08 (Certification Deviations) RD81

Note: EPA reports into AFS unless otherwise negotiated. Compliance Codes of "In Compliance (MC), In Violation (MV), or Unknown (MU)" are entered for Title V Annual Compliance Certification reviews.

23. Date Scheduled DTS1

Note: The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the "Title V Annual Compliance Certification Due/Received by EPA" action, and is not enforcement sensitive.

24. HPV Violation Type Code(s) VTP1

Note: To be identified when the Day Zero action is established.
25. HPV Violating Pollutant(s) VPL1
Note: To be identified when the Day Zero action is established.

Timeliness Standard
26. Action Reported within 60 Days of Event reported in the Date Achieved (DTA1) field of the action record for state and local agencies, with a minimum upload of six (6) times per year. Monthly updating is encouraged. Federal Data is to be reported on a monthly basis.

OPTIONAL/DISCRETIONARY DATA REPORTING TO AFS: NON-MDR DATA

The following items cover data that is not considered an MDR, but will be useful and helpful for program implementation, evaluation and oversight. State and local agencies are encouraged to report the following items whenever practicable.

- Minor Facility information: For minor sources that are not MDR (MDR for minor facilities is defined as: Minor NESHAP, a minor facility identified within the CMS plan for evaluation, minor facilities with an enforcement action <3 years old, or any HPV case regardless of class) reporting is optional but encouraged. Minor source information would include NSPS and MACT subpart applicability.

- Stack Test Pollutant (PLC1)

- Partial Compliance Evaluations (PCEs) and specific reporting of On-Site PCE activity defined as: Complaint Partial Compliance Evaluation, Permit Partial Compliance Evaluation, Process Partial Compliance Evaluation, Partial Compliance Evaluation On-Site Observation. (Note: All PCEs are required to be reported by EPA Regional offices. Also, any negotiated PCEs that are part of an alternative frequency which is part of an agency's CMS plan are required to be reported.)

- Reporting more frequently than every 60 days.

- State Investigations initiated (Enforcement Sensitive).

- Title V Permit Program Data Elements (PPDEs): Required for reporting to AFS by the Office of Air Quality Planning and Standards (OAQPS), used by the Office of Enforcement and Compliance Assurance (OECA) for major source universe population. To be established when the Title V permit is issued. AFS will require the establishment of an AFS ID, the individual permit number, category, and event type for permit issued plus the date achieved. Permit Program Data Elements (PPDEs) include the Permit Number (ASPN), Permit Category (PMTC), and Permit Issuance Event Types (IF-Permit Issued and IR-Permit Renewal) and the date (PATY/PDEA).

SECTION 2: CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE MONITORING STRATEGY (CMS) POLICY AS IMPLEMENTED IN AFS

A. BACKGROUND:

In April 2001, the Clean Air Act (CAA) Stationary Source Compliance Monitoring Strategy (CMS) was revised to provide national consistency in developing stationary source air compliance monitoring programs. The CMS provides a framework for developing stationary source air compliance monitoring programs that focus on achieving measurable environmental results. State, Locals, and Regions record their compliance monitoring activities and enter facility-specific compliance data in AFS.

The CMS introduces new compliance monitoring tools: Full Compliance Evaluations, Partial Compliance Evaluations, and Investigations. A Full Compliance Evaluation (FCE) is a comprehensive evaluation of the compliance status of a facility. It addresses all regulated pollutants at all regulated emission units. Furthermore, it addresses the current compliance status of each emission unit, as well as the facility's continuing ability to maintain compliance at each emission unit. A Partial Compliance Evaluation (PCE) is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. A PCE should be more comprehensive than a cursory review of individual reports. It may be conducted solely for the purpose of evaluating a specific aspect of a facility, or combined over the course of a year to satisfy the requirements of a Full Compliance Evaluation. PCEs may include: Site Visits, Conferences, Review of Required Reports, Compliance Reviews of individual Air Programs, Emission Inventory reviews, Stack Test reviews, or other activities. **It is recommended that Regional values of PCEs describe the evaluating action taking place, such as "Conference on Site" or "RATA Review"**. An Investigation is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. It usually is based on information discovered during a Full Compliance Evaluation, or as the result of a targeted industry, regulatory, or statutory initiative. Also, an Investigation often requires the use and analysis of information not available in EPA data systems. It is best used when addressing issues that are difficult to evaluate during a routine FCE because of time constraints, the type of preliminary field work required, and/or the level of analytical expertise needed to determine compliance.

Additionally, stack testing is an important tool used to determine a facility's compliance with emission limits established pursuant to the CAA. CMS recognized that consistent, complete and accurate stack test information is critical in managing a national air program. Hence, the CMS recommends that States/Locals should conduct a stack test, or require the facility to conduct a stack test, whenever they deem appropriate. States/Locals should also conduct a stack test, or require the facility to conduct a stack test, when there are no other means for determining compliance with the emission limits. The data and results (Pass/Fail) of all stack tests should be entered in AFS, and the High Priority Violation (HPV) status adjusted as appropriate.

The policy focuses on Title V major and larger synthetic minor sources. These sources are marked in AFS with a CMS Category:

CMS CATEGORIES (CMSC)

CMSC	DESCRIPTION
A	STATE/LOCAL AGENCY OVERSIGHT AT MAJOR SOURCES
E	EPA OVERSIGHT FOR TRIBAL LANDS AT MAJOR SOURCES
M	STATE/LOCAL AGENCY OVERSIGHT AT MEGA SOURCES
G	EPA OVERSIGHT FOR TRIBAL LANDS AT MEGA SOURCES
S	STATE/LOCAL AGENCY OVERSIGHT AT 80% SYNTHETIC MINOR SOURCES
N	EPA OVERSIGHT FOR TRIBAL LANDS AT 80% SYNTHETIC MINOR SOURCES
O	STATE/LOCAL AGENCY OVERSIGHT AT OTHER/ALTERATIVE SOURCES
Z	EPA OVERSIGHT FOR TRIBAL LANDS AT OTHER/ALTERATIVE SOURCES

Since the inception of the policy, an additional category has been introduced: O=Other. This category allows States and Regions the ability to include minor or other than 80% Synthetic Minor sources into the plan, as negotiated alternatives for sources that are not being evaluated within the negotiated time frame as agreed upon with the Regional office. In order to accurately track and document evaluations of sources on tribal lands, additional values have been added to the CMS table in 2008.

Along with a CMS category, each source in the plan has a recommended evaluation frequency. The default values for each category are:

A/E Major Sources: Evaluation every 2 Years
M/G Mega Sources: Evaluation every 3 Years
S/N 80% Synthetic Minor Sources: Evaluation every 5 Years
O/Z Other Sources: No default value

The CMS policy was placed into effect during FY2002. The first two years of the policy are FY2002 - FY2003. Major sources identified in the plan should have received a Full Compliance Evaluation during this period. AFS can provide detailed listings of sources that have been identified as belonging to the CMS universe, along with dates of last evaluation.

B. PLAN IMPLEMENTATION AND AUTOMATIC UNKNOWN COMPLIANCE STATUS:

CMS plans are renewed every two years, with updating allowed on an annual basis. The CMS policy also includes tracking of stack test observations, and reviews completed by Regional and State staff. Previous monitoring policies did not credit in-house reviews of stack tests. Also included are the reviews of Annual Compliance Certifications from Title V sources. These new reviews are also reported to AFS and include deviations reported and reported compliance.

Another feature of the plan is the ability to use AFS to generate an unknown compliance status for any CMS source that has not received a Full Compliance Evaluation within the negotiated frequency. The automatic unknown compliance status generation utility will generate a “U” value to the EPA Compliance Status fields. AFS will use the date of last inspection or evaluation, compare it to the current date and then if no evaluation has been completed during the frequency period, automatically generate an unknown compliance status value of “U”. AFS will maintain the generated status on the SIP or FESOP air program code, using the pollutant “FACIL”.

The original utility in AFS utilized the CMS Category (CMSC) and the supplied Evaluation Frequency (CMSI) and the date of the last evaluation to generate an unknown compliance status. Also included in the algorithm was the ability to identify plants that had been recently added to AFS or had a change in their CMS category, in order to correctly generate the status. A value of “U” for “Unknown Compliance Status” was generated in the EPA Compliance Status values for plants that have not been evaluated within their indicated frequency, based on a ‘rolling window’ of time. For example, a major source with the default evaluation period was defined with a CMSC of ‘A’ and a CMSI of ‘2'. Unknown compliance at this plant would be generated after 730 days from its last evaluation. The utility used to generate the unknown value runs in two parts: Generation and Un-generation of the unknown value.

The application of the Unknown Compliance Status on a rolling-day window required that the subsequent evaluations had to be held before the next scheduled evaluation otherwise the unknown value would be applied. For example, if a source was evaluated on October 1, 2002, then it would need to be evaluated on or before October 1, 2004 in order to avoid the unknown value. State and Local Agencies requested a review of the utility in order to provide more flexibility in the scheduling of subsequent evaluations.

The utility was changed on October 1, 2005. The new utility does not generate the Unknown Compliance Status until the end of a fiscal year in which the plant is scheduled for evaluation. For example, a plant evaluated in January 2003 has a CMSC of “A” and a CMSI (frequency) of 2. The previous utility would use a rolling window of time for the generation of the unknown status, and would generate it in January 2005 if no Full Compliance Evaluation activity has been entered into AFS. Now, state/local agencies will have until the end of FY2005 (September 30, 2005) to evaluate the plant. This provides the State/Local Agency with the flexibility to use the remainder of the fiscal year in which to evaluate the plant.

Additionally, **the generation of Unknown Compliance Status in the new utility will not be run until December of each year** in order to provide a 60-day lag of application, in accordance with the requirements of the recently-renewed Information Collection Request (ICR). During the months of October and November of 2005 the generation of the value will not be run. The un-generation of the unknown value, however, will continue to run monthly.

Appendix 9, AFS Utilities in 2009, provides a schedule of when the system will be updated with automatic Unknown Compliance Status generation. The charts in Appendix 1 show how the utility will be executed in AFS, additionally; the table below indicates the differences between the utilities.

Utility Features	Old Utility	New Utility
Uses CMSC, CMSI, Default Date of the Latest FCE, CMS Start Date and the current default Compliance Status to generate unknown compliance.	Same	Same
Sources already in noncompliance or unknown compliance are not affected	Same	Same
Air Program	Utility used existing air programs, starting with SIP and working downward until an existing air program code was utilized.	Utility will use either the Title V or SIP air program. If Title V is present, it will be used. If not, SIP will be used. If SIP is not present, the utility will generate the SIP air program.
Air Program Pollutant	The unknown value of "U" is generated on the FACIL air program pollutant. If this pollutant is not already present on the plant records, it is generated.	Same as the old utility.
Frequency of Utility	The Generation and Un-generation of the value was originally run each night. Due to Working Capital Fund restrictions, the frequency of the utility was recently changed to a monthly basis.	The generation utility will be run once a month, during the first Thursday of the month, with the exceptions of October and November of each year. This ensures that the values are correctly generated before the OTIS/ECHO extracts from AFS are completed during the second weekend of each month, and before AFS generates monthly historic compliance status values. **At the start of each fiscal year, the generation will be delayed for 60 days (not run during October and November); however, the un-generation will continue on a monthly basis.**

ABC's of Generating an Unknown Compliance Status

A = Actual (FY of the latest ***A***ctual FCE)
B = Baseline (FY of the ***C***urrent date - CMSI)
C = Current (FY of the ***C***urrent Date)
If ***B*** is greater than ***A***, then generate unknown compliance

Apply the formula above to these examples to see how the utility will generate Unknown Compliance Status:

Example	Dates of Latest FCE for major sources with a CMSC of A and a CMSI of 2:	With no FCE reported, Unknown Compliance will generate on:
1	February 12, 2004	December 1, 2006
2	July 16, 2005	December 1, 2007
3	September 5, 2004	December 1, 2006
4	October 31, 2004	December 1, 2007
5	December 1, 2004	December 1, 2007
6	July 16, 2003	December 1, 2005

Explanation of Example 1 -
A = FY04 (February 12, 2004)
B = FY05 (October 1, 2006 (FY07) - 2)
C = FY07 (October 1, 2006)
If ***B*** (FY05) is greater than ***A*** (FY04), then generate unknown compliance

Explanation of Example 2 -
A = FY05 (July 16, 2005)
B = FY06 (October 1, 2007 (FY08) - 2)
C = FY08 (October 1, 2007)
If ***B*** (FY06) is greater than ***A*** (FY05), then generate unknown compliance

Explanation of Example 3 -
A = FY04 (September 5, 2004)
B = FY05 (October 1, 2006 (FY07) - 2)
C = FY07 (October 1, 2006)
If ***B*** (FY05) is greater than ***A*** (FY04), then generate unknown compliance

Explanation of Example 4 -
A = FY05 (October 31, 2004)

B = FY06 (October 1, 2007 (FY08) - 2)
C = FY08 (October 1, 2007)
If ***B*** (FY06) is greater than ***A*** (FY05), then generate unknown compliance

Explanation of Example 5 -
A = FY05 (December 1, 2004)
B = FY06 (October 1, 2007 (FY08) - 2)
C = FY08 (October 1, 2007)
If ***B*** (FY06) is greater than ***A*** (FY05), then generate unknown compliance

Explanation of Example 6 -
A = FY03 (July 16, 2003)
B = FY04 (October 1, 2005 (FY06) - 2)
C = FY06 (October 1, 2005)
If ***B*** (FY04) is greater than ***A*** (FY03), then generate unknown compliance

Appendix 1 contains a chart that shows further information on the automated utility process.

See Section 3C-Action Records for specific requirements for each CMS policy data element. For further information on the CMS policy and implementation in AFS, refer to: http://www.epa.gov/compliance/resources/publications/data/systems/air/cmstechman.pdf

C. TRACKING CMS PLANS WITH AFS FIXED REPORTS:

Two useful reports have been added to AFS to facilitate tracking of CMS plan completion: AFS 655-CMS Summary and AFS 670-Illogical CMS Assignments.

The AFS 655 Report highlights each source within the CMS plan (identified by CMS category) and, depending upon the date of the report execution, determines if the source has been evaluated within the negotiated frequency identified in the CMSI field. This report is available as a printed report or workfile. It is recommended that the report be run as a workfile for data manipulation.

The AFS 670 Report targets sources with illogical CMS category assignments. For example, if a minor source has been identified with CMSC of S (identifying it as an S-80% Synthetic Minor source), the source will be presented in the report's output. Any major source not included in the CMS plan (default classification is A and CMSC is blank) is also included in the output of the report. This report is available as a printed report or workfile. It is recommended that the report be run as a workfile for data manipulation.

D. HISTORIC CMS RECORDS:

During FY2008 the system was asked if historic values of the CMSC could be maintained within AFS. State Review Framework (SRF) reviews of prior fiscal years are using current CMSC and CMSI values that in many cases have been changed since the timeframe of review. Programming is underway to create historic records of the CMSC and CMSI in AFS and is expected to be completed by FY2010.

SECTION 3: USING AFS FOR COMPLIANCE/ENFORCEMENT TRACKING

A. PLANT LEVEL RECORDS

AFS maintains a Plant General record which includes all source geographical information such as Plant Name, Street Address, City, County Name, State, Government Facility Code and Zip Code. Along with this information are optional data reporting features for mailing address, staff assigned to track the source, contact names and telephone numbers, and other miscellaneous information. This section of the compendium will document information about data on the Plant General Records. See Appendix 2 for a list and description of the fields in the AFS structure.

1. Entering a New Plant and Identification Numbers into the Database:
The FIP State and County code plus a five-digit PCDS number are required to enter a new plant in AFS. Numbering conventions for the PCDS number are at the discretion of the delegated agency. There should be only one plant ID for each source. A plant is defined as an entity operating at a physical location contained within a fence line. Change of ownership does not affect a source number; history of the source goes to the new owner. A plant identification number should change if the facility changes physical location. A change in location not only requires a new identification number, but requires all historic information to be reestablished under the new number. It is recommended that when a new major source is established in AFS, the AFS Plant ID number (for Title V Operating Permit Data) also be established.

On June 30, 2004 the AFS Configuration Control Board approved the following procedure for plants that may relocate:

WITHIN THE SAME STATE, SAME COUNTY: A change of Street Address (STRT) is required. Optional records via a comment or action (Address Change) may be entered into AFS to document the address change (this optional information is strongly encouraged).

WITHIN THE SAME STATE, DIFFERENT COUNTY: A new SCSC is required. The Source Swap utility is available to facilitate changing the plant ID. Contact the AFS Helpline for assistance in maintaining Compliance History records.

LOCATION CHANGE TO A DIFFERENT STATE: Data changes for plants relocating to different states should be handled on a plant-by-plant basis, as different legal situations will apply. Should the relocation cross EPA Regional boundaries, the appropriate AFS Compliance Manager should be contacted for instructions on assigning ID numbers.

2. Plant Name:
AFS has a 40-character field for Plant Name. The current plant name is to be recorded in this field, taken from a plant permit or other documents commonly used such as invoices, signs, telephone listings or other business documents. Many agencies use the name cited on the Title V permit for the Plant Name. The name should identify the owning corporation and site name, if applicable. Name changes should be entered as soon as they are identified to the delegated

agency. Many agencies document a name change in the plant comments and/or Regional actions.

3. Latitude/Longitude:
Data in latitude/longitude fields in AFS is considered obsolete. It was owned and maintained by the Air Emission Inventory community which no longer uses AFS as its repository of data.

4. SIC/NAIC Codes:
AFS will accept either Standard Industrial Code (SIC) or the North American Industrial Code (NAIC) codes; however, it is recommended that BOTH codes be populated. During FY2008, efforts have been made to populate NAICS fields for those SICs with one-to-one definitions in order to increase the number of sources with populated NAICS codes. The primary SIC/NAICS code should reflect the major activity at the plant. A new ad hoc acronym called **SCNC** has been created and will function like an "OR" operator between SIC and NAICS code searches in ad hoc retrievals. This new search acronym can be used to search for plants that have a SIC or NAICS code that matches the specified value given by the user in any ad hoc retrieval. It compares the User-specified value with the primary SIC code and the NAICS code on the Plant-General record. If the SCNC value is 4 digits long, it will be compared against the plant's SIC code. If the SCNC value is 6 digits long, it will be compared against the plant's NAICS code. SCNC values of lengths other than 4 or 6 will return nothing as these codes do not exist in AFS.

5. State Registration Number:
Although this is an optional reporting field, it is encouraged that agencies populate their own system number in AFS for reference. This field can be used to facilitate reconciliation of state systems to AFS.

6. Governmental Facility Code:
This field identifies sources owned or operated by different levels of government. Although identification of the owner/operator can be defined down to the municipal level, at a minimum any federally owned/operated source needs to be defined.

7. Portable Sources:
The County Code of "777" is to be used for reporting portable sources to AFS. A portable source is defined as a process that may or may not be permitted but can be moved from place to place, for example, an Asphalt Processing Plant is movable from site to site and can emit pollutants above the major threshold level. The Facility Registry System (FRS) and ENVIROFACTS web site will map and present sources with a "777" county number as located at the center of the county identified by the Plant City Name.

8. Archiving Permanently Closed Sources:
The Operating Status of Permanently Closed is used when the source owner/operator has no future legal right to reopen the source without full review by the permitting authority, i.e. where the owner/operator has relinquished all permits to the permitting authority. Permanently Closed sources may be archived from the production mode of AFS after six years of no activity IF the following situations are true:

- The source has never had a high priority (HPV) or significant violation (SV);
- Has never been part of a CMS plan;
- Has never had formal enforcement activity; or
- Has never had a change to compliance status history.

Sources that have had these situations must not be archived. It is requested that these sources not be removed from the production mode of the database unless the data is incorrect. HPV/SV data as well as evaluation plans are used in many different types of data analyses. Compliance history information is used in trend analyses. It is recommended that state and local users of AFS contact their Regional AFS Compliance Manager before archiving sources, as some regions have instituted procedures for class change, deletion of plants, and archiving. Regional managers may require additional archiving procedures, but regional requirements should be as stringent as this guidance.

9. Local Control Region (LCON):
The Local Control Region is a user defined two-character code identifying the local control region with jurisdiction over a plant. It is an optional field, and can be used to identify a facility to which a Region, State or Local Agency may have jurisdiction. Use of the LCON field can quickly facilitate oversight of sources within an agency were jurisdiction crosses county or city lines, but not state lines.

An ad hoc retrieval from AFS using county code(s) in the selection criteria may result in more facilities than needed. However, if LCON = xx is used as selection criteria, then only those facilities within the LCON will be presented in the report. LCON selection criteria are also available in OTIS and ECHO as options for retrieving data.

When used in update, LCON values will be validated against the LCON table. The LCON table will be located as an entry on the Utility Table menu and it has the same functions as other tables in AFS. LCON values can be globally entered for all plants in a geographic area. Use batch transaction type 10-3 for the specific geographic area, and include the following information:

SCSC	columns 1-10
Transaction type	column 11-12; Value ‘10’
Sequence code	column 13; Value ‘3’
LCON	columns 67-68
Update code	column 80; Value ‘C’

In June 2006, the listing of LCON values in the AFS were updated (please see Appendix 4 for the listing of LCON values as of March 2009).

B. AIR PROGRAM AND AIR PROGRAM POLLUTANT RECORDS

1. Air Programs:
An Air Program code in AFS defines a regulatory program of the Clean Air Act applicable to a facility**. All applicable air program codes are to be reported.** In cases where State or Local

delegations incorporate stricter requirements than the federal regulatory program, reporting of the federal air program is sufficient. A plant must have at least one applicable air program with one air program pollutant in order to be established in AFS. Air program codes are also necessary for reporting actions in AFS, and must be established on Screens 302/303 (Air Program Update and Air Program Pollutant Update) before use in an action record. Permits issued to a source will document the applicable air programs and can be used as a source of data for this field.

a. **Air Program Operating Status**:
An operating status must be reported for each air program. The Operating Status represents the operational condition of a plant associated with a given air program. The most significant value will bubble up to the Plant General Record. The value of most significant operative value to least is: O=Operating, L=Landfill, R=NESHAP Renovation, D=NESHAP Demolition, S=NESHAP Spraying, I=Seasonal, T=Temporarily Closed, C=Under Construction, P=Planned Facility, X=Permanently Closed. Statuses O, T, and I are used in the National RECAP reporting measures. Values L=Landfill, R-NESHAP Renovation, and D=NESHAP Demolition and S=NESHAP Spraying are considered obsolete.

b. Applicable Air Program Codes:

0 State Implementation Plan (SIP)
1 SIP Source under Federal Jurisdiction
3 Non-Federally Reportable Source
4 Chlorofluorocarbons (CFC) Tracking
6 Prevention of Significant Deterioration (PSD)
7 New Source Review (NSR)
8 National Emission Standards for Hazardous Air Pollutants (NESHAP)
9 New Source Performance Standards (NSPS)
A Acid Precipitation
F Federally Enforceable State Operating Permit – Non Title V (FESOP)
I Native American
M Maximum Achievable Control Technology (MACT) Section 63 NESHAP
T Tribal Implementation Plan (TIP)
V Title V Permits

Air program code definitions continue:

Code	Description
0	State Implementation Plan (SIP)

Section 110 of the Clean Air Act requires each state to adopt and submit to EPA for approval a SIP that provides for the maintenance, implementation and enforcement of the National Ambient Air Quality Standards (NAAQS). Each SIP must include a permit program to regulate the modification and construction of any stationary source of air pollution, including stationary sources in attainment and nonattainment areas of the state, as necessary to assure that NAAQS are achieved. SIP requirements are federally enforceable under Section 113 of the Act. Reference 40 CFR Part 52. The SIP air program is considered applicable to each Federally Reportable stationary source in AFS.

Additional reporting requirements for SIP are promulgated as standards for various industrial categories. These standards are reported as subparts to the SIP, and are generally identified using the same subpart identification as the New Source Performance Standards (NSPS). Reporting of SIP subparts are optional, see Air Program Code 9, New Source Performance Standards (NSPS) for a list of applicable subparts.

1 SIP Source under Federal Jurisdiction (FIP)

Under current law, a federally implemented plan to achieve attainment of air quality standards is used when a state is unable to develop an adequate plan, or if jurisdiction does not exist. Sources located on Indian Land should reflect the Native American air program code.

3 Non-Federally Reportable

Used to report State/Local/Tribal requirements not defined as federally reportable [reference Section 1, Minimum Data Requirements (MDRs)].

4 Chlorofluorocarbons (CFC) Tracking

Under Title VI of the Clean Air Act, EPA is responsible for several programs that protect the stratospheric ozone layer. These programs include: Motor Vehicle Air Conditioning; Stationary Refrigeration and Air Conditioning, Halon Blends and Handling; Phase-out of Ozone Depleting Substances; Methyl Bromide; Nonessential Products Ban; Product Labeling, and Federal Procurement. Reference 40 CFR Part 82. This program is not delegated to State, Local, or Tribal agencies. Evaluations completed at a source with only the CFC air program should be reported as an FCE, evaluations completed at sources with multiple air programs should be reported as PCEs.

6 Prevention of Significant Deterioration (PSD)

Part C of the Clean Air Act sets requirements for the prevention of significant deterioration (PSD) of air quality in those areas designated as either attainment or unclassifiable for purpose of meeting the National Ambient Air Quality (NAAQS) standards. These requirements are designed to protect public health and welfare, to assure that economic growth will occur in a manner consistent with the preservation of existing clean air resources and to assure that any decision to permit increased air pollution is made only after careful evaluation of all the consequences of such a decision and after public participation in the decision making process. PSD prohibits the construction and operation of a major emitting facility in an area designed as attainment or unclassifiable unless a permit has been issued that compiles with Section 165 of the Act, including the requirement that the facility install the best available control technology for each pollutant subject to regulation.

7 New Source Review (NSR)

New Source Review is a preconstruction permitting program that serves two important purposes:

a. It ensures the maintenance of air quality standards when factories, industrial boilers and power plants are modified or added. In areas with unhealthy air, NSR assures that

new emissions do not slow progress toward cleaner air. In areas with clean air, especially pristine areas like national parks, NSR assures that new emissions fall within air quality standards. Emission calculations are completed using potential emissions.

b. The NSR program assures that state of the art control technology is installed at new plants or at existing plants that are undergoing a major modification.

In August 2003, EPA issued a final rule that creates a category of activities that automatically will be considered routine maintenance, repair and replacement (RMRR) under the NSR permitting program. The rule defines a process unit, delineates the boundary of a process unit, defines a "functionally equivalent" component, and defines basic design parameters for electric utility steam generating units and other types of process units. See http://www.epa.gov/ttn/nsr/rule_dev.html for a copy of this rule.

8 National Emission Standards for Hazardous Air Pollutants (NESHAP PART 61)
Section 112 of the Clean Air Act identifies substances that have been designated as hazardous air pollutants (HAPs), known for serious health effects, including cancer, from ambient air exposure. HAPs include: Asbestos, benzene, beryllium, coke oven emissions, inorganic arsenic, mercury, radio nuclides and vinyl chloride. Reference 40 CFR Part 61. Additional reporting requirements for NESHAP are promulgated as standards for various industrial categories. These standards are identified as subparts to the NESHAP, and can be reported to AFS in the 302/502 (Air Program) screen. Subpart reporting is mandatory. For a complete listing for the codes for 40 CFR Part 61 (NONMACT NESHAP) Subpart please refer to Appendix 5: NSPS, NESHAP and MACT Air Subpart Tables.

9 New Source Performance Standards (NSPS PART 60)
Section 111 of the Clean Air Act requires EPA to publish a list of categories of stationary sources that emit or may emit any air pollutant, and to establish federal standards of performance for new sources of air pollutants. The list must include categories of sources which are determined to cause or significantly contribute to air pollution which may endanger public health or welfare. "New sources" are defined as stationary sources, the construction or modification of which is commenced after the publication of the regulations or proposed regulations prescribing a standard of performance applicable to such source. Reference 40 CFR Part 60. Additional reporting requirements for NSPS are promulgated as standards for various industrial categories. These standards are reported as subparts to the NSPS and also to the SIP. Reporting of NSPS subparts is mandatory. As all subpart identifiers are added to AFS as upper-case letters, a conflict with certain subparts using upper and lower case letters has required a special character use for proper identification of the subpart. Two NSPS subparts have been identified with conflicting upper and lower case letters. The AFS Control Configuration Board (CCB) approved the following data entry procedure on June 30, 2004 for use in uniquely identify the following subparts:

AA/A will report AAA: Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed after August 7, 1983

AAA will continue to report AAA: New Residential Wood Heaters

C/C will report Cc: Municipal Solid Waste Landfills

CC will continue to report CC: Standards of Performance for Glass Manufacturing Plants

The use of the "/" character before a lower case letter will provide unique identification of the subpart within AFS.

For a complete listing of codes for 40 CFR Part 60 (NSPS/SIP) Subparts please refer to Appendix 5: NSPS, NESHAP and MACT Air Subpart Tables.

A Acid Precipitation

The Acid Rain Program requires major reductions of sulfur dioxide and nitrogen oxide emissions (key components of acid rain) from electric utilities, while establishing a new approach to environmental protection through the use of market incentives, a "cap and trade" process. Affected sources are required to install systems that continuously monitor emissions in order to track progress, ensure compliance, and provide credibility to the trading component of the program. Regulated sources must report all emissions as measured by continuous emissions monitors. EPA has established standard reporting procedures and has issued standard software for such reporting. Emissions are submitted to the Emissions Tracking System (ETS) using ETS-FTP software. Although AFS users are encouraged to identify and track CFC tracking sources, the tracking of this program is done in the ETS-FTP software. See http://www.epa.gov/airmarkt/reporting/edr21/index.html for more information on reporting Acid Rain emissions.

F Federally Enforceable State Operating Permit Program (FESOP)

This program (usually through SIP revision) provides a mechanism for states to establish federally enforceable State operating permits limiting the potential to emit for sources to remain below the applicability threshold for the operating permits program of Title V of the Clean Air Act (CAA). This program is available to allow States to issue FESOPs to small sources and exempt them from the Title V review, as the large number of small sources could be a resource burden on both the agency and the small sources. FESOP provides the mechanism to establish federally enforceable limits on sources' potential to emit below the Title V threshold. This air program is used for reporting sources classified as Synthetic Minor (SM).

I Native American

This program is used to identify sources located on Indian Lands. Sources do not have to be operated by tribal entities, but are subject to Tribal authority. In the absence of a Tribal Authorization Rule (TAR) or Implementation Plan (TIP), this air program will be used to identify any source subject to Tribal rule. All other applicable air programs need to be identified.

M Maximum Achievable Control Technology (MACT PART 63)

The EPA is directed to use technology-based and performance-based standards to significantly reduce routine emissions of hazardous air pollutants of facilities within an industry group or source category. The NESHAP standards implemented in 1990 regulate specific categories of stationary sources. The standards of this part are independent of NESHAP. A MACT standard is based on emission levels that are already being achieved by the lower-emitting sources of an industrial sector. Eight years after a MACT standard is issued, EPA must assess the remaining health risks in the categories and may implement additional standards to care for any remaining risk. Reference 40 CFR Part 63. See http://www.epa.gov/ttn/atw/socatlst/socatpg.html for a listing of all source categories and promulgation schedules. Please refer to Appendix 5: NSPS, NESHAP and MACT Air Subpart Tables for a complete listing of the codes for 40 CFR Part 63 (MACT NESHAP) Subparts as of June 2006.

T Tribal Implementation Plan (TIP)

A TIP is an enforceable plan approved by the EPA that provides for the maintenance, implementation and enforcement of the National Ambient Air Quality Standards (NAAQS). It contains strategies for maintaining and improving current air quality, attain NAAQS if in violation, provides for a preconstruction permitting program for new and modified major sources or minor sources, and a plan to handle regional haze. It does not include Acid Rain (Title IV), Operating Permits (Title V), or Stratospheric Ozone Protection (Title VI) programs. TIPS are authorized by Section 301(d) of the CAA and through the Tribal Authority Rule (TAR) of 1998. TIP requirements are federally enforceable under Section 113 of the Act. All applicable air programs need to be listed along with this air program. Air program code “I” can be discontinued upon effective date of the TIP.

V Title V Operating Permits

Reference 40 CFR Part 70. The Final Rule (July 31, 1992) established an operating permit program for States to develop programs for issuing operating permits to all major stationary sources and to certain other sources. Title V does not impose new requirements; it does provide a permit to operate that assures compliance with all applicable requirements. It allows the delegated agency the authority to collect permitting fees. All permits are required to contain standard permit requirements that specify and reference the origin of authority for each applicable term or condition, the duration of the permit (not to exceed 5 years), the monitoring and related recordkeeping and reporting requirements, emissions trading allowed, Federally-enforceable and compliance requirements. Any operating source with Title V permit application pending should have the “V” air program code with the operating status of “P” for pending entered in AFS. Once the permit has been issued, the operating status should be upgraded to “O” for operating.

c. Air Program Subparts:

Air program subparts are additional reporting requirements promulgated as standards for various industrial categories. Reporting of subparts for NSPS, NESHAP and MACT are required. AFS will provide a screen for reporting subparts on the following air programs:

0 State Implementation Plan (SIP)
1 SIP Source under Federal Jurisdiction
8 NESHAP
9 NSPS
M MACT

AFS was recently upgraded to allow up to 12 subparts to be added to an air program. (December 2005). See Appendix 5, NSPS, NESHAP and MACT Air Subpart Tables.

2. Air Program Pollutant Records:

a. Pollutant Code or Chemical Abstract Number:

Each source in AFS requires at least one air program code and at least one pollutant. Pollutants are reportable using either a five-digit pollutant code or a Chemical Abstract Service Number (CASN). AFS has tables listing all pollutant codes and CASNs. If the Pollutant Code is used and an equivalent CASN exists for the code, AFS will populate the CASN automatically. If the CASN is entered and an equivalent Pollutant Code exists, AFS will populate the Pollutant Code automatically.

b. Classification:

AFS requires the user to report a category identifying the potential amount of pollutants emitted per year. Criteria pollutant (CO, SO2, VOC, Pb, NO2, Particular Matter) classification uses an emissions threshold identified by EPA establishing major thresholds based on attainment with National Ambient Air Quality Standards (NAAQS). Major emission thresholds are 100 tons or more per year in an area that is currently in attainment. Attainment/Nonattainment designations can be found at http://www.epa.gov/oar/oaqps/greenbk/ . EPA has the ability to document a classification value separate from the state/local value. Nonattainment designations will decrease the emissions thresholds:

Pollutant	Nonattainment Classification	Threshold (Tons per Year)
Ozone	Marginal	100
Ozone	Moderate	100
Ozone	Serious	50
Ozone	Severe	25
Ozone	Extreme	10

Pollutant	Nonattainment Classification	Threshold (Tons per Year)
CO	Moderate	100
CO	Serious	50
PM-10	Moderate	100
PM-10	Serious	70

Emission thresholds for Hazardous Air Pollutants (HAPs) are sources with the potential to emit (controlled or uncontrolled) 10 tons of any one HAP, or 25 tons of any combination of HAPs (reference Section 112(a)). Source Classification values are:

A Major emissions; Actual or potential emissions are above the applicable major source thresholds

SM Synthetic Minor emissions; Potential emissions are below all applicable major source thresholds if an only if the sources complies with Federally enforceable regulations or limitations (Potential to emit at the major threshold but due to operation restrictions or other controls emit at the minor level)

B Minor emission; Potential uncontrolled emissions are below the applicable major source thresholds

C Emissions classification is unknown

The values A, SM, B, and C are considered the valid values for this field and should be used for Air Program Pollutant data entry using Update Screen 303, Browse Screen 503, and Batch Transaction 131 – columns 25 – 26. .

As of October 1, 2006, AFS classification codes of A1, A2, E1, ND, and UK will be coded as obsolete and consequently are no longer available for data entry. This action was taken to simplify data entry and description of classifications.

AFS will bubble up the highest classification value from the air program records to the Plant General records (DCL1-Default Class, ECL1-EPA Class, and SCL1-State Class). Plant level compliance status and classification are automatically generated in AFS using the Air Program and Air Program pollutant records for the plant. No exclusion was provided for permanently closed air program resulting in plant level classification and compliance status values generated from shut down air programs. In order to prevent bubble up values from air programs with a ‘Permanently Closed’ operating status, AFS will exclude operating status values from permanently closed facilities unless there is only one air program at the plant.

For example: A facility has multiple air programs. The SIP Air Program is operating and is classified as SM. The Title V Air Program is permanently closed (status X) and its associated pollutants are shut down (Compliance Status 9) but the pollutants recorded for the Title V Air Program reference a major classification. The classification values for the Title V pollutants are more significant than the SIP, the major classification bubbles up to the plant level indicating it to be a major facility even though the Title V Air Program is shut down. The desired value in this instance should be the SM classification.

To address this, if the Air Program Status for an air program is permanently closed (AST1=X), then it is excluded from the bubble up of plant level classification and compliance status. However, if a plant only has permanently closed air programs, then compliance and classification would be generated using the existing air program(s) even though they're permanently shut down. Additionally, if the Compliance Monitoring Strategy Category (CMSC) is present, all air programs are included in the bubble-up of plant level classification and compliance status regardless of operating status.

c. Compliance Status:

Each pollutant must have a corresponding compliance status. Compliance is defined within 4 categories: In Violation, In Compliance, Meeting Schedule, and Unknown Compliance. EPA has the ability to record a compliance status in addition to the state/local compliance value.

The following definition of compliance with the Clean Air Act is extracted from *The Timely and Appropriate (T&A) Enforcement Response to High Priority Violations (HPVs)*, June 1999:

"*In Compliance means all Federal and State administrative and judicial action against the source is complete and the source has been confirmed to be complying with the CAA. This term, as it is used in the HPV Policy, refers to a source being in compliance with all aspects of CAA requirements, not simply their emission limit*."

A source with pending enforcement activity is considered in violation or meeting a schedule until all penalties are completely paid, all injunctive relief, supplemental enforcement actions, civil and judicial activity are completed. Unaddressed High Priority Violators must be listed in violation until addressed: status is then changed to Meeting Schedule or a violation status as appropriate until resolution. Valid values for compliance status are listed in order of worst case scenario to best, suggested use is highlighted in bold:

<u>VIOLATION</u>

B In violation with regard to both emissions and procedural compliance

1 In Violation - No schedule

6 In violation - Not meeting schedule

7 In Violation - Unknown with regard to schedule*

W In violation with regard to procedural compliance

UNKNOWN COMPLIANCE

Y Unknown with regard to both emissions and procedural compliance

0 Unknown compliance status

A Unknown with regard to procedural compliance

U Unknown by Evaluation Calculation (Generated value - not available for input)

MEETING SCHEDULE

5 Meeting Compliance Schedule

IN COMPLIANCE

C In compliance with procedural requirements

4 In Compliance - Certification (Used in reporting Title V Annual Compliance Certifications)

3 In Compliance – Inspection (Used in reporting compliance determinations from Full Compliance Evaluations)

M In Compliance - CEMS

2 In Compliance - Source Test

8 No Applicable State Regulation

9 In Compliance - Shut Down

P Present, See other programs (This compliance status is a place holder used to avoid assigning a state compliance status when the state has not supplied a value.)

*In January 2009, status 7 was moved from an UNKNOWN classification to the VIOLATION classification, as voted by the AFS Compliance Managers.

d. Attainment/Nonattainment Indicator:

Criteria pollutants (VOC, SO2, NO2, Pb, Particular Matter, CO) have attainment designations that need to be recorded in AFS. These indicators are not automatically generated and must be supplied by the user. Reference the EPA Green Book (http://www.epa.gov/oar/oaqps/greenbk/) for the most recent designation values. EPA has a value available separately from the state value. It

is anticipated that the EPA values will be updated twice yearly with the expected months of update being March and September of each calendar year. After an update has been completed users should notice the pollutant record will reflect the date updated and JH1 (System Administration) as the User ID responsible for making the update. States and Local Agencies may request blanket population of the State values (counties with partial designations will not be populated) by contacting their Regional AFS Compliance Manager.

C. ACTION RECORDS

1. Fields:

These activities are reported to AFS via an Action Record (Screen 306 for update/Screen 507 for browse) and contain the following components (note that required fields are highlighted by **BOLD** text):

FIELDS	NOTES
KEY ACTION	**(Y-YES OR N-NO)**
AIR PROGRAM CODE(S)	**At least one–and all that are applicable**
ACTION TYPE	**A Regional Action Type. Actions which are MDRs require mapping to a National Action type.**
DATE SCHEDULED	**Required for certain actions**
DATE ACHIEVED	**Either the Date Scheduled or Date Achieved is required.**
	Date Achieved must be applied for application in National analysis/reports.
RESULTS CODE	As applicable**, required for certain actions**
PENALTY AMOUNT	**Required if assessed**
RDE8	**As applicable, required for certain actions**
STAFF CODE	Optional
POLLUTANT CODE	As applicable
CONTRACTOR ID	Optional-considered obsolete
RDE 16	Optional

KEY ACTION: Identification of a key action is mandatory for action linking in HPV, FCE or Non-HPV pathways. EFFECTIVE JUNE 2006: AFS will automatically indicate as key any day zero action types. The National Action Types affected are:

HPV Pathways	2B, 2E, 2U, 2Z
FCE Pathways	5E, 5F, 5G, 5H
Non-HPV Pathways	NH

Historically, the field defaults to a NO value. Direct users of AFS indicated a "Y" for YES value if the action is the key for a High Priority Violator (HPV) or Non-HPV pathway. Batch users of AFS triggered this value by supplying the Key Action Number on the action transaction.

AIR PROGRAM CODE(S): Any applicable air program for a reported activity should be listed on the action record. AFS will not accept an air program code that has not been documented in Screens 302 (update) and Screen 502 (browse). Users should not enter only one air program if more programs are applicable for the activity reported. Valid values are:

0 State Implementation Plan (SIP)
1 SIP Source under Federal Jurisdiction
3 Non-Federally Reportable Source
4 Chlorofluorocarbons (CFC) Tracking
6 Prevention of Significant Deterioration (PSD)
7 New Source Review (NSR)
8 National Emission Standards for Hazardous Air Pollutants (NESHAP)
9 New Source Performance Standards (NSPS)
A Acid Precipitation
F Federally Enforceable State Operating Permit – Non Title V (FESOP)
I Native American
M Maximum Achievable Control Technology (MACT) Section 63 NESHAP
V Title V Permits

ACTION TYPE: This field is the **Regional Action Type** identifying the activity. Each EPA Region has its own action type table (please refer to Appendix 3a for a comprehensive listing of Regional Action Types, Appendix 3b for a listing of Tribal Action Types, and Appendix 3c for allowable duplicate action types) with values mapping into the National Action Type tables. Users do not report activity using a National Action Type. The 2-digit Regional Action Type is predefined in an action table. AFS will not accept a value that is not on record in the table. Normally, action records are reported to AFS with unique action types and dates. There are a few instances were actions happening on the same day are allowable. For example: A Full Compliance Evaluation (FCE) at a source would not logically be completed twice on the same day. A stack test, however, can be completed multiple times on a specific day with different processes and pollutants involved in each test. Appendix 3c outlines the allowable National Action types that can be reported multiple times using the same date. Users can use a special code of "00" which is used in instances where the action table does not have a valid value for use, and is not expected to be a recurring activity. For example: A source with an active High Priority Violator (HPV) pathway suffers a fire, destroying most of the source. As this activity is important to the HPV information, an AFS user may want to include this information in the HPV pathway. There is no action type in the Regional table describing a fire. The user can report the

fire using action type “00" with a mandatory description of “Fire”. Use of action type “00" requires the entry of a short description of the action. The Regional AFS Compliance Manager should be contacted for addition of action types to the Regional table.

When requesting a new Regional Action Type or a change to an existing type, please provide the following information to the appropriate Regional AFS Compliance Manager. This information will be submitted to the System Administrator for application to the table:

- Regional Table to be changed:
- Action Type to be added/changed:
- Action Definition:
- Action Description-Long (up to 50 characters):
- Action Description-Short (up to 15 characters):
- Linkage to National Action Type:

DATE SCHEDULED: AFS provides space for reporting the scheduled date of an activity. This field is optional reporting for most activities but can be required in Compliance Monitoring Strategy (CMS) reporting. The reporting parameter is YYMMDD, with YY representing the last two digits of a year (example: 2003 is reported as 03), MM as the 2-digit month (example: June is reported as 06), and DD as the day of the month. **Date Scheduled is an Enforcement Sensitive field**, with the exception of National Action Type CB or CC (Title V Annual Compliance Certification Due/Received by the Permit Authority or EPA), and any regional action type mapped to it. Either the Date Scheduled or Date Achieved is mandatory for action reporting.

DATE ACHIEVED: This field is most frequently reported, and reflects the final date of an activity. Please see discussions of individual action types for the definition of Date Achieved. The reporting parameter is YYMMDD, with YY representing the last two digits of a year (example: 2003 is reported as 03), MM as the 2-digit month (example: June is reported as 06), and DD as the day of the month. Either the Date Scheduled or Date Achieved is mandatory for action reporting.

RESULTS CODE: A two-digit alphanumeric code used to indicate the result of an activity. The code must be a valid value on the Results Table. Each Region maintains its own Results Code Table. This field is optional for most activity, but mandatory for Stack Test and Annual Compliance Certification Reviewed reporting.

PENALTY AMOUNT: This field reports dollar amounts of penalties. In formal enforcement actions, it defines the dollar amount of any cash penalty that is either 1) assessed (required) by an administrative order, consent agreement/order, or consent decree; or 2) proposed under a civil referral or civil filing. No decimal values are entered. See Section 5 for in-depth discussion of the use of the Penalty field. In Supplemental Environmental Projects, the penalty field reports

the dollar value of the project. Penalties exceeding the seven-digit limit of the PAM1 field in AFS can be reported by entering the alpha K after the value of thousands of dollars. For example, $5,000,000.00 could be reported as "5000K".

REGIONAL DATA ELEMENT 8 (RDE 8): This 2-digit field is optional for most activities, but required in Annual Compliance Certification deviation reporting (an EPA requirement). It is defined by users and used to maintain information relating to a plant action. In Title V Annual Compliance Certification reporting, this field identifies a compliance status.

STAFF CODE: A 3-digit code identifying a staff member responsible for or associated with an action. This code must be a valid value on the Staff Code table. Entry of values on the Staff Code table requires a special access code on the user's security profile. Normally access to update the Staff Code Table is provided to one user per state or local agency. Use of the Staff Code field is optional to all users.

POLLUTANT CODE: A five-digit code identifying the pollutant of record for an action. Reporting of the pollutant code is required for HPV Key Actions. Pollutant code may be reported on stack test actions (highly recommended but not required).

CONTRACTOR ID: Use of this field is optional. The Contractor ID is a 12-digit alphanumeric field used to identify asbestos contractors. The ID must be a valid value from the Contractor ID Table. This field is considered obsolete.

REGIONAL DATA ELEMENT 16 (RDE 16): This 25-digit optional field is defined by users and used to maintain information relating to plant level actions.

ASSOCIATED DAY ZERO (KEY ACTION NUMBER): This field identifies key action numbers an action may be associated or linked to and is system generated.

2. Full Compliance Evaluations (FCEs):

The definition of an FCE is extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001: A Full Compliance Evaluation is a comprehensive evaluation of the compliance status of a facility. It addresses all regulated pollutants at all regulated emission units. Furthermore, it addresses the current compliance status of each emission unit, as well as the facility's continuing ability to maintain compliance at each emission unit.

A Full Compliance Evaluation should include the following:

- A review of all required reports, and to the extent necessary, the underlying records. This includes all monitored data reported to the regulatory agency (e.g., CEM and continuous

parameter monitoring reports, malfunction reports, excess emission reports). It also includes a review of Title V self-certifications, semi-annual monitoring and periodic monitoring reports, and any other reports required by permit.

- An assessment of control device and process operating conditions as appropriate. An on-site visit to make this assessment may not be necessary based upon factors such as the availability of continuous emission and periodic monitoring data, compliance certifications, and deviation reports. Examples of source categories that may not require an on-site visit to access compliance include, but are not limited to, gas-fired compressor stations, boilers in large office and apartment buildings, peaking stations, and gas turbines.
- A visible emission observation as needed.
- A review of facility records and operating logs.
- An assessment of process parameters such as feed rates, raw material compositions, and process rates.
- An assessment of control equipment performance parameters (e.g., water flow rates, pressure drop, temperature, and electrostatic precipitator power levels).
- A stack test where there is no other means for determining compliance with the emission limits. In determining whether a stack test is necessary, States/locals should consider factors such as: size of emission unit; time elapsed since last stack test; results of that test and margin of compliance; condition of control equipment; and availability and results of associated monitoring.
- A Full Compliance Evaluation may be done piecemeal through a series of Partial Compliance Evaluations.
- **A complete review of all data in AFS to assure reporting accuracy**. This review should include plant level data, air programs and operating status, air program pollutant class(es), compliance status, attainment area status, HPV status, and default class(es) and status.
- An FCE must be completed within the frequency indicated by the Compliance Monitoring Strategy in order to avoid application of the automatic unknown compliance status utility.

FIELD	**NOTES**
AFS REPORTING	**REQUIRED REPORTING-RECAP**
AIR PROGRAM CODE(S):	**Required, usually "V" for Title V and any other applicable air programs**
ACTION TYPE:	**Regional equivalents of:**
	FE EPA Conducted FCE On Site
	FZ EPA FCE Off Site
	FS State Conducted FCE On Site
	FF State FCE Off Site
DATE SCHEDULED:	Optional

DATE ACHIEVED:	**Required, reflect the date the onsite FCE is completed or the date of the evaluation report (offsite FCE)**
RESULTS CODE:	Optional
PENALTY AMOUNT:	Not appropriate for this action type
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Not required
CONTRACTOR ID	Not required
RDE 16	Not required

3. Partial Compliance Evaluations (PCEs):

The definition for a PCE is extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001: A Partial Compliance Evaluation is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. A PCE should be more comprehensive than a cursory review of individual reports. It may be conducted solely for the purpose of evaluating a specific aspect of a facility, or combined over the course of a year to satisfy the requirements of a Full Compliance Evaluation. PCEs may include: Site Visits, Conferences, Review of Required Reports, Compliance Reviews of individual Air Programs, Emission Inventory reviews, or other activities. It is recommended that Regional values of PCEs describe the evaluating action taking place, such as "Conference on Site" or "RATA Review".

FIELD	**NOTES**
AFS REPORTING	**Required for Federal Reporters, Optional for State/Local/Tribal Reporters**
AIR PROGRAM CODE(S):	**Required, usually "V" for Title V and any other applicable air programs**
ACTION TYPE:	**Regional equivalent of:** **ES EPA Conducted PCE On Site** **EX EPA PCE Off Site** **PS State Conducted PCE On Site** **PX State PCE Off Site** The following **optional** action types are available for use in reporting PCEs: **EE-EPA or PC-State/Local: Complaint Partial Compliance Evaluation**: Used for reporting the

investigation of a complaint resulting in the on-site visit of a stationary source.

EP-EPA or PP-State/Local: Permit Partial Compliance Evaluation: Used for reporting pre-and post-permit issuance activities, where an on-site visit is necessary to review individual processes or installation of equipment.

EM-EPA or PR-State/Local: Process Partial Compliance Evaluation: Used for reporting the review of one or more plant processes for compliance purposes. For example, Maximum Achievable Control Technology (MACT) notifications and resulting compliance determinations.

EO-EPA or PO-State/Local: Partial Compliance Evaluation On-Site Observation: Used for reporting any on-site review of source to include visible emissions or other observed activity.

DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required, can reflect either a review date or actual date of visit.**
RESULTS CODE:	Optional
PENALTY AMOUNT:	Not appropriate for this action type
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Not required
CONTRACTOR ID	Not required
RDE 16	Not required.

4. Stack (Performance) Tests:

As taken from the 2003 National Stack Test Guidance: Stack testing is defined as any standardized procedure of actions using calibrated tools to determine a rate or concentration in order to verify emissions from a source or the accuracy of a monitor or gauge. It does not include visible emission observations. The date a stack or performance test is completed is documented in AFS, with a **compliance determination** (updating of compliance status, as appropriate) from the results. Test results are reflected in the Results Codes (PP-PASS, FF-FAIL or 99-Pending). Federal reporters are required to report the pollutants tested in the Pollutant Code field on the action record. Pollutant Code reporting for State/Local/Tribal reporters is optional; multiple actions on the same day with multiple pollutants are acceptable. There are multiple action types for Stack Tests. They are:

2A EPA Source Test Conducted: EPA test required, observed, and reviewed.

3A Owner/Operator Conducted Source Test: Must be State/Local agency observed and reviewed.

6C State Source Test Conducted: Must be State/Local agency observed and reviewed.

TE EPA Required Stack Test Not Observed: Owner/Operator Conducted test, required by EPA, reviewed by EPA, but not observed by EPA

TO EPA Required Stack Test Observed: EPA required stack test, Owner/Operator conducted, observed by EPA.

TR State Required Stack Test Not Observed: Owner/Operator Conducted test, required by the State or Local Agency, reviewed but not observed by the State.

If the results of a stack test report are not known when reporting the stack test, a results code of "99-Pending" may be used. However, the "Pending" results code is considered to be a temporary value and is to be replaced with the pass/fail results code within 120 days of the date of the stack test. Fixed Format Report 658, Pending Stack Tests Report, has been created to assist with the ability to easily update these records. This report provides all stack test actions with a pending code "99" for more than 120 days, along with a file of AFS action transactions to facilitate reporting of actual results codes.

Action "TT/TS-EPA/State Receipt of Stack Test Report" has been added for the facilitation of reporting High Priority Violator (HPV) cases involving failed stack tests where the results of the stack test were not known when initially reported to AFS. The use of this optional action type allows agencies reporting HPVs the opportunity to report a Day Zero action within timeliness requirements, as this action documents the receipt of when the discovering agency first receives information concerning a Federally-enforceable violation, consistent with the HPV Policy (see HPV Policy, Section IVA), and would also be the Discovery Date. See Section 11, for more information.

Action "SS/ST-EPA/State Non-MDR Stack Test" has been added for reporting performance tests for purposes other than determining or demonstrating compliance. See the National Stack Test Guidance of September 30, 2005 for full definitions of tests meeting the definition of this action type. Should this test result in a failure, appropriate MDR stack test types (2A, 6C, TO, 3A, TE, TR) should be used to report the failure. The action should be reported using the SIP Air Program Code. This action type is for optional use and is not included in official stack test activity reports.

FIELD	**NOTES**
AFS REPORTING:	**REQUIRED REPORT–RECAP**
AIR PROGRAM CODE(S):	**Required, usually "V" for Title V and any other applicable air programs**
ACTION TYPE:	**Regional equivalent of:**

	2A EPA Source Test Conducted
	3A Owner/Operator-Conducted Source Test
	6C State Source Test Conducted
	TE EPA Stack Test Not Observed
	TO EPA Stack Test Observed
	TR State Stack Test Not Observed
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Effective October 1, 2006: All Stack Test actions should reflect the date of the actual test, regardless of the review date. Date should reflect the last day of actual test as per reference methods.**
RESULTS CODE:	**Required: PP-PASS, FF-FAIL, 99-PENDING**
PENALTY AMOUNT:	Not appropriate for this action type
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	**Required reporting for Federal Reporters, Optional reporting for State/Local/Tribal Reporter**
CONTRACTOR ID	Not required
RDE 16	Not required.

5. Investigations:

The definition of an Investigation is extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001: An Investigation is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. It usually is based on information discovered during a Full Compliance Evaluation, or as the result of a targeted industry, regulatory, or statutory initiative. Also, an Investigation often requires the use and analysis of information not available in EPA data systems. It is best used when addressing issues that are difficult to evaluate during a routine FCE because of time constraints, the type of preliminary field work required, and/or the level of analytical expertise needed to determine compliance.

Investigations are tracked in AFS via two Action Types: Initiated and Completed. Initiated action types are Enforcement Sensitive. At the start of an Investigation, the action types documenting the initiated date should be added. At the completion of the Investigation (which could span fiscal year time frames), the action types documenting the completion date should be added.

FIELD	**NOTES**
AFS REPORTING	**REQUIRED REPORTING–RECAP**

AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalents of:**
	EI EPA Investigation Initiated
	EC EPA Investigation Conducted
	SI State Investigation Initiated
	SC State Investigation Conducted
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Actual dates of investigation initiated and completion.**
RESULTS CODE:	Not required
PENALTY AMOUNT:	Not appropriate for this action type
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID	Not required
RDE 16	Not required.

6. Notices of Violation:

A notice of violation (NOV) sent by EPA or the State/Local Agency informing a source that a violation by the authority granted by Section 113 of the Clean Air Act as amended in 1990, or similar State authority for a violation of the Clean Air Act has occurred. An NOV is considered an informal enforcement action. No penalty is applied to a Notice of Violation. **If an agency has a Stipulated Penalty Demand Letter, or an NOV with a proposed penalty, then both the NOV and the Administrative Order with Penalty action types should be reported.**

FIELD	**NOTES**
AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalent of:**
	6A EPA NOV Issued
	7C State NOV Issued
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Signature date of the NOV letter.**
RESULTS CODE:	Not required
PENALTY AMOUNT:	**Not appropriate for this action type** (Proposed Penalties or Stipulated Penalty Demand Letters should be reported as an 8C-Administrative Order)

RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID	Not required
RDE 16	Not required.

7. Administrative Orders:

DEFINITION: An administrative action (not civil or judicial) against a source with or without an assessed penalty that has been determined by the proper authority for violating the Clean Air Act as amended in 1990, or other State-delegated regulations. The penalty reported will be an assessed cash penalty. These actions are addressing actions for High Priority Violator (HPV) tracking, and are to be used in conjunction with action linking.

State and Local reporters use the State Administrative Order Issued to report activity not of a civil or judicial nature. Additionally, if the agency uses a stipulated penalty demand letter, or submits a Notice of Violation with proposed penalties to a source, an administrative order in addition to the NOV action type should be reported to AFS. All state penalties reported within the Administrative Order action should be assessed cash penalties and should not include any injunctive relief, Beneficial or Supplemental Environmental Project costs.

EPA Administrative Orders do not have any penalties applied. EPA Administrative Penalty Orders (APOs) are a three-step reporting process starting with the 7F-113(D) Administrative Penalty Order Filed, with the Date Achieved reflecting the filing date of the action and the penalty reflecting the proposed penalty from the order. It is followed by the second step, C2-113(D) Administrative Penalty Order Recalculated, which contains the mitigated assessed penalty amount. This second action documents the APO, and provides the record of formal and final penalty. The last activity, C3-APO Collected, documents when the assessed penalty is paid. All enforcement tracking is done using the C2-113(D) Administrative Penalty Order Recalculated action type.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	Required, should reflect the applicable air programs
ACTION TYPE:	**Regional equivalents of:**
	8A Federal 113(A) Order Issued
	8C State Administrative Order Issued
	Federal APOs
	7F EPA 113(D) Complaint Filed
	C2 EPA 113(D) Recalculated–CAFO

	C3 EPA 113(D) Collected
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Date of the official instrument.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	**8C- State Final Assessed Cash Penalty**
	7F-EPA Proposed Cash Penalty
	C2-EPA Final Assessed Cash Penalty
	C3- EPA Assessed Cash Penalty Paid
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

8. Consent Decrees:

A decree signed by the primary enforcement authority, the source, and by a court requiring a source violating an applicable Federal or SIP regulation to attain compliance by means specified in the decree. Consent Decrees and consent agreements should be tracked here if they are formally signed. This is an addressing action for a high priority violator. Penalties reported are the assessed dollar amount of any cash civil penalty. This action is also used for Administrative Consent Decrees.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	Required, should reflect the applicable air programs
ACTION TYPE:	**Regional equivalents of:**
	6B EPA Court Consent Decree
	2D State Court Consent Decree
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Date Decree entered in State or Federal Court**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	**Assessed Cash Penalty.**
RDE8:	Not required
STAFF CODE:	Not required

POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

9. Civil Referrals:

Federal Civil Referrals: Action taken by EPA to file a civil complaint in Federal court pursuant to the authority granted under State law for violating applicable State regulations or State-delegated Federal regulations. Additionally, this action is to be used in the preparation of a litigation report to initiate a Federal civil action against a noncomplying source and submittal to Headquarters is imminent (to be counted here the litigation report must have the Regional Air Director approval). Penalties reported are the assessed dollar amount of any cash civil penalty. This is an addressing action for a high priority violation. This action is Enforcement Sensitive. If this action is used in a High Priority Violator case, action type OT is also required.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	Required, should reflect the applicable air programs
ACTION TYPE:	**Regional equivalents of:**
	4B EPA Civil Referral
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Signature date of litigation report.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	**Proposed Penalty**
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

State Civil Referral: An action taken by the State or local agency against a source resulting in a civil complaint being sent to the State Attorney General. This is different from a State Civil Action (action type 9C) which is the actual filing of a civil complaint against a source by the State Attorney General in a State court. This action is an addressing action for high priority violations and is to be used in action linking. This action is Enforcement Sensitive. If this action is used in an HPV case, action type OT is also required.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**

AIR PROGRAM CODE(S):	Required, should reflect the applicable air programs
ACTION TYPE:	**Regional equivalents of:**
	1E Civil Referral to State Attorney
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Signature date of referral document.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	Not required.
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

10. Civil Actions

Federal Civil Actions: Reporting of Federal Civil Actions has not been well-documented in AFS. Reporting of this activity is done in the Integrated Compliance Information System (ICIS). During FY04, an AFS workgroup is chartered to review and document how AFS should handle this type of action. More guidance is necessary for Federal Civil Action reporting in conjunction with High Priority Violator Cases. At this time, the only action type available for reporting the outcome of a Federal Civil action is 7B-EPA Civil Penalty Assessed.

State Civil Action: The filing of a civil compliant against a source by the State Attorney General in a State Court. Action is taken by a State or Local Agency to file a civil complaint against a source in the State Court pursuant to the authority granted under State Law for violating applicable SIP or State-delegated Federal regulations. Additionally, this action type is used to document settlement proceedings. This action is an addressing action for high priority violations and is to be used in action linking.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	Required, should reflect the applicable air programs
ACTION TYPE:	**Regional equivalents of:**
	9C State Civil Action
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required.** Date of Court filing or Decision Date.

RESULTS CODE:	Not required.
PENALTY AMOUNT:	**Assessed Cash Penalty, if reporting settlement**
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

11. High Priority Violator (HPV) Day Zero

DEFINITION: A High Priority Violator (HPV) is identified one of three ways:

1. The violation may fit within one of the ten General HPV Criteria identified in the HPV Policy of June 1999.
2. The violation may lead to emissions or parameter violations that fit within the HPV Matrix Criteria (reference HPV Policy of June 1999).
3. The violation may be categorized as an HPV on a discretionary basis subject to the mutual agreement of the State/Local agency and EPA.

HPV cases are tracked in AFS via action linkage with the following information:

1. Day Zero Action Type: Defines a state/local, joint, or Federal lead and a start date. Indicates the start of an HPV pathway and requires a compliance status change to violation.
2. Violation Type Code: A three-digit code defining the reason why a source has met the definition of HPV. Code tables can be found in AFS in the Utilities, under Descriptions, Violation Codes. Additionally, the code tables are provided in this section.
3. Discovery Date: The date of discovery is usually defined by one of the following activities:
   - A Full Compliance Evaluation;
   - A Partial Compliance Evaluation (On- or Off-Site Evaluations);
   - A Title V Annual Compliance Certification--Due/Received or Reviewed;
   - Stack Tests
   - Receipt of Stack Test Report or
   - Investigations.
4. Violating Pollutant(s): Pollutant(s) in violation. If the violation does not involve a specific pollutant (i.e. permit paperwork violations), use the pollutant code “FACIL” Pollutant codes must be used to capture violating pollutant(s). If you have a substance without an existing pollutant code, please contact the AFS Helpline (1-800-367-1044) for assistance.

5. Addressing Action: Usually an enforcement action or civil referral. This section contains a table defining addressing action types.

6. Resolving Action: An action that closes out the violation, and requires a compliance status change to compliance.

Each of these milestones has reporting criteria and the reporter must link all appropriate actions to the Day Zero action in AFS. Linkage is started by indicating a Key Action. [Note: Day Zero and the Addressing Action **MUST NOT** be recorded on the same day.]

In August 2006, AFS was enhanced to check for the presence of an addressing action when a resolution action is applied. Prior to this, AFS allowed pathways to be resolved with no addressing action linked into the pathway. Pathways in AFS prior to this time (August 24, 2008) were not affected by this enhancement.

On October 3, 2008, another enhancement to HPV data provides retrievable acronyms for HPV addressing and resolution actions. This enhancement also required that an addressing action in a pathway could not be changed or deleted if the pathway as resolved. These enhancements were added to ensure data quality and correct reporting of pathways. The following table provides the new retrievable HPV fields:

FIELD NAME		**ACROYNM**
DISCOVERY	Discovery Action Date	**D**ADT
	Discovery Regional Action Type	**D**ATP
	Discovery Regional Action Type Description (generated not stored)	**D**ADS
ADDRESSING	Addressing Action Date	**A**ADT
	Addressing Regional Action Type	**A**ATP
	Addressing Regional Action Type Description (generated not stored)	**A**ADS
	Addressing Action Penalty Amount	**A**APA
RESOLUTION	Resolution Action Date	**R**ADT
	Resolution Regional Action Type	**R**ATP
	Resolution Regional Action Type Description (generated not stored)	**R**ADS

The October 2008 enhancement also identifies the individual milestones within the pathway so the user can easily identify discovery, addressing and resolution actions. A “D”, “A” or “R” are placed to the left of the actions within the pathway, as seen by this example:

```
AIR PROGRAM CODE(S) : 0 9 8 V M 6    STATE REGISTRATION NUMBER: TEAM 0314
COMP STAT (EPA/ST)  : 5 / 1   CLASS: A   STAFF: BAF    GOVT FACIL: 0     HPV: F
LEAD AGENCY: S VIOLATION IDENTIFIER: S VIOLATING PLLTS: THAP
VIOLATION TYPE CODE:  GC2
DAY 60: 061024 DAY 150: 070123 DAY 270: 070523 DAY 300: 070622
DAYS USED TO ADDRESS: 66   UNADDRESSED DAYS: 0
```

ACTION NUM/IND/TYP			ACTION DESCRIPTION	DATE SCHED	DATE ACHVD	PENALTY	RESULTS	RESULTS DESCRIPTION	ST PRIV
284		N6	STATE DAY ZERO	060825	060825		01	ACTION ACHIEVED	N
289		PD	PENALTY PAID	061230	061113	0022000	01	ACTION ACHIEVED	N
290	A	Z3	ST ADM PEN ORD	061030	061030	0022000	01	ACTION ACHIEVED	N
303	D	44	STTE PT INSP	060711	060711		01	ACTION ACHIEVED	N
452	R	V2	VIOLATE RESOLVE	080822	080822		01	ACTION ACHIEVED	N

Guidance on the HPV policy and AFS reporting can be found at:

http://www.epa.gov/compliance/resources/policies/civil/caa/stationary/hpvmanualrevised.pdf

Regions are encouraged to use the 620 Fixed Report, HPV Pathway Summary Report, to track cases with state/local agencies. This report will include the Day Zero action, information on the lead, and all linked actions including the first comment on the Day Zero action. It is recommended that the lead agency provide an action comment with information concerning the violation. The first comment attached to the key action record will be provided on the 620 report. EPA uses the 653 Fixed Report, HPV Summary Report, to track the days used to address and track unaddressed cases. [Note: Compliance status needs to be updated during the HPV process.] Additionally, the 659 Fixed Report, High Priority Violator Report, provides HPV tracking information with a stream-lined summary report. It also includes resolution dates not found in the 653 report.

DAY ZERO DEFINITION: Day Zero will ordinarily be no later than 45 days from the day the violation was discovered. For violations requiring additional information, Day Zero may be extended to 90 days from the date the violation is discovered or the date of receipt of the additional information. If a violation is self-reported, Day Zero will be 30 days from the date the agency receives the information. A Notice of Violation action can document the Day Zero action. **In addition to reporting the Day Zero and action linking, the plant compliance status should be changed to reflect violation.** Day Zero actions that have been added to AFS in error should be deleted from the database. If an HPV case is discontinued (no enforcement action will be taken), one of the following methods should be used to close out the case:

- If the facility is in compliance, use action type 2K/7G-Source Returned to Compliance with no Further Action required. These action types resolve the pathway.
- If the facility is still in violation but the case is being dropped for litigation risk or other related issues, a written record to the file is required and action type C7-Closeout Memo Issued should be entered. This action type will resolve the pathway.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalents of:** **2Z EPA Day Zero** **2E State Day Zero** **2U Enforcement Lead is Unassigned** **2B Shared Enforcement Lead**
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Date determined by policy.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	Not required.
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	**A pollutant can be reported here or reported on the HPV linkage screen under Violating Pollutants.**
CONTRACTOR ID:	Not required
RDE 16	Not required.
VIOLATING POLLUTANTS:	**Required, report using pollutant codes.**
LEAD AGENCY:	Not required, but recommended. AFS will also identify a pathway by its Day Zero action type.
VIOLATION IDENTIFIER:	Not required.
VIOLATION TYPE CODES:	**Required. See following tables for values.**

ACTION LINKING FOR HPV CASES IS REQUIRED.

HPV DISCOVERY DATE: On October 1, 2005, the minimum data requirements for AFS were expanded to include the activity that lead to the discovery of an HPV and is required to be identified within the appropriate violation pathway in AFS. AFS has been enhanced to include the discovery date of a violation pathway on the HPV Flag Action Pathway Matrix screen (Screen 515). Actions defining discovery (Full Compliance Evaluations, Partial Compliance Evaluations, Stack Tests, Investigations, Receipt of Stack Test Report and Title V Annual Compliance Certification Review or Due/Received) linked within an HPV pathway will trigger the summary on the HPV Flag Action Pathway Matrix screen.

Use of the National Action Type "TT/TS-EPA/State Receipt of Stack Test Report" is used when the stack test results were not known at the time when the action was reported to AFS. When this action is used in an HPV pathway, it will be used as the HPV Discovery Date versus the stack test action. This action type is intended to be used in conjunction with appropriate stack

test actions, however, AFS will use the TT/TS action type equivalents to document HPV Discovery Date. Use of this action will document the receipt of when the discovering agency first receives information concerning a Federally-enforceable violation, consistent with the HPV Policy.

In November 2006, the AFS Compliance Managers voted to add the addition of Title V Annual Compliance Certification Due/Received actions as an HPV Discovery Date. This action was added as many HPV situations were determined due to an overdue TV Annual Compliance Certification. The Due/Received action captures the date of the discovery in the Date Achieved field and should be used as the Discovery Date action.

Additionally, retrievable acronyms have been created in order to facilitate review and analysis of this information:

AFS Acronym	Description
DADT	HPV Discovery Date, can be used as selection or output criteria, date format is YYYYMMDD
DATP	HPV Discovery Action Type, can only be used as output, provides the Regional Action Type used to define the HPV Discovery Date
DADS	HPV Discovery Action Description, can only be used as output, reflects the description of the Regional Action Type used to define the HPV Discovery Date

The following sample screen print from AFS depicts the addition of the HPV Discovery Date:

```
DATE  :  01/06/06        AIRS FACILITY SUBSYSTEM - BROWSE        PGM:  AFP515
SCREEN:  515              HPV FLAG ACTION PATHWAY MATRIX         MAP:  AFM5151
==============================================================================
 00000  SAMPLE PLANT                                          123 MAIN STREET
 AIR PROGRAM CODES:  M MACT (SECTIO     V TITLE V PERM     0 SIP
 STATE COMPL STAT:  1 IN VIOLATION - NO   EPA COMPL STAT:  5 MEETING COMPLIANCE
------------------------------------------------------------------------------
CURR HPV FLAG: S  EFF DATE: 20041029  FLAG SOURCE: S  ACTION NO: 439

DAY ZERO ACTION DISCOVERY  ADDRESSING ACTION   DAYS USED TO  RESOLVED ACTION
/DATE ACHIEVED    DATE     TYPE/DATE ACHIEVED    ADDRESS     TYPE/DATE ACHIEVED
--------------- ---------  ------------------  ------------  ------------------
 439  20041029   20040706
 077  20000223   20000223     X2  20000711          139
 101  20010301   20001122     Z3  20020110          315         V5  20031229
 059  19980817   19980420     X2  20000112          513         Q5  20031002
 042  19970519   19971215     29  19970917          121         V2  20030912
 047  19980224   19980421     X2  19980626          122         V2  19981217
```

Users are also encouraged to enter a short comment describing the violation on the Day Zero Action.

HPV MATRIX VIOLATION CODE TABLE

DESCRIPTION TYPE: VC - VIOLATION TYPE CODES

GC1	Fail to Obtain PSD or NSR Permit: Failure to obtain a PSD permit (and/or to install BACT), an NSR permit (and/or to install LAER or obtain offsets) and/or a permit for a major modification of either.
GC2	Viol. Of Air Toxics Requirements: Violation of air toxics requirement (i.e. NESHAP, MACT) that either results in excess emissions or violates operating parameter restrictions.
GC3	Violation that Affects Synthetic Minor Status: Violation by a synthetic minor of an emission limit or permit condition that affects the source's PSD, NSR, or Title V status.
GC4	Enforcement Violation: Violation of any substantive term of any Local, State, or Federal order, consent decree or administrative order.
GC5	Title V Certification Violation: Substantial violation of the source's Title V certification obligations.
GC6	Title V Permit Application Violation: Substantial violation of the source's obligation to submit a Title V permit application.
GC7	Testing, Monitoring, Recordkeeping, or Reporting Violation: Violations that involve testing, monitoring, recordkeeping, or reporting that substantially interfere with enforcement or determining the source's compliance with applicable emission limits.
GC8	Emission Violation: Violation of an allowable emission limit detected during a reference method stack test.
GC9	Chronic or Recalcitrant Violation: CAA violations by chronic or recalcitrant violators.
G10	Section 112(r) Violation: Substantial violation of CAA Section 112(r) requirements.

HPV MATRIX CODES

MATRIX CODE	AFS DESCRIPTION	VIOLATION	METHOD OF DETECTION	MAPS TO POLICY MATRIX #	STANDARD	SUPPLEMENTAL SIGNIFICANT THRESHOLD[1]	% IN EXCESS OF REFERENCE LIMIT/PARAMETER		% OF TIME IN EXCESS OF REFERENCE LIMIT
M1A	Any violation of emission limit detected via stack testing.	Violation of Allowable Emissions Limitations, reference HPV Matrix Criteria 1A, reference method stack testing.	Stack Testing	1-Emission Violation Detected by Stack Test	Any applicable requirement		Any violation of the applicable standard	N/A	
M1B	Violation of emission limits > 15% via sampling	Violation of allowable emissions limitations, reference HPV Policy Matrix Criteria 1B, coatings analysis, fuel samples or other process material sampling.	Coatings analysis, fuel samples, other process materials sampling or raw/process materials usage reports.	2-Emission Violation Using Process/Formulation Data	Any applicable requirement		> 15% of the applicable emission limitation	N/A	
M1C	Violation of emission limits > the SST (Supplemental Significant Threshold)	Violation of allowable emissions limitations, reference HPV Policy Matrix Criteria 1B, coatings analysis, fuel samples or other process material sampling.	Coatings analysis, fuel samples, other process materials sampling or raw/process materials usage reports.	2-Emission Violation using Process/Formulation Data	Any applicable requirement	CO 23 lb/hr, NOX 9 lb/hr, SO2 9 lb/hr, VOC 9 lb/hr, PM 6 lb/hr, PM10 3 lb/hr	> the SST. [1]	N/A	
M2A	Violation of Direct Surrogate for >5% of limit for >3% of OT (operating time)	Violation of parameter emissions limitations, reference HPV Policy Matrix Criteria 2A, continuous/periodic parameter monitoring.	Continuous/Periodic Parameter Monitoring (includes indicators of control device performance).	3-Surrogate Limit Violation	Any applicable requirement		> 5% of the applicable parameter limit	FOR	>3% of the operating time during the reporting period.
M2B	Violation of Direct Surrogate for >50% of OT (operating time).	Violation of parameter emissions limitations, reference HPV Policy Matrix Criteria 2A, continuous/periodic parameter monitoring.	Continuous/Periodic Parameter Monitoring (includes indicators of control device performance).	3-Surrogate Limit Violation	Any applicable requirement				Any exceedance of the parameter limit for >50% of the operating time during the reporting period. [3]

HPV MATRIX CODES

MATRIX CODE	AFS DESCRIPTION	VIOLATION	METHOD OF DETECTION	MAPS TO POLICY MATRIX #	STANDARD	SUPPLEMENTAL SIGNIFICANT THRESHOLD[1]	% IN EXCESS OF REFERENCE LIMIT/PARAMETER		% OF TIME IN EXCESS OF REFERENCE LIMIT
M2C	Violation of Direct Surrogate of >25% for 2 reporting periods.	Violation of parameter emissions limitations, reference HPV Policy Matrix Criteria 2A, continuous/periodic parameter monitoring.	Continuous/Periodic Parameter Monitoring (includes indicators of control device performance).	3-Surrogate Limit Violation	Any applicable requirement				Any exceedance of the parameter limit for >25% of the operating time during the reporting period, continuing through the subsequent consecutive reporting period. [3]
M3A	Violation of non-opacity standard via CEM of >15% for >5% of operating time.	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	<=24 hour averaging period		Any exceedance > 15% of the applicable standard.	FOR	>5% of the operating time during the reporting period. [4] [6]
M3B	Violation of non-opacity standard via CEM of the SST (Supplemental Significant Threshold).	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	<=24 hour averaging period	CO 23 lb/hr NOX 9 lb/hr SO2 9 lb/hr VOC 9 lb/hr	Any exceedance of the SST.		
M3C	Violation of non-opacity standard via CEM of >15% for 2 reporting periods	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	<=24 hour averaging period		Any exceedance of 15% of the applicable standard.	FOR	>3% of the operating time during two consecutive reporting periods. [4] [6]
M3D	Violation of non-opacity standard via CEM of >50% of the operating time during the reporting period.	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	<=24 hour averaging period				Any exceedance of the reference limit for >50% of the operating time during the reporting period. [3]

HPV MATRIX CODES

MATRIX CODE	AFS DESCRIPTION	VIOLATION	METHOD OF DETECTION	MAPS TO POLICY MATRIX #	STANDARD	SUPPLEMENTAL SIGNIFICANT THRESHOLD[1]	% IN EXCESS OF REFERENCE LIMIT/PARAMETER		% OF TIME IN EXCESS OF REFERENCE LIMIT
M3E	Violation of non-opacity standard via CEM of >25% during two consecutive reporting periods.	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	<=24 hour averaging period				Any exceedance of the parameter limit for >25% of the operating time during the reporting period, continuing through the subsequent consecutive reporting period. [3]
M3F	Any violation of non-opacity (>24 hours standard) via CEM.	Violation of applicable standards (non-opacity), reference HPV Policy Matrix Criteria 3A, continuous emissions monitoring.	Continuous Emissions Monitoring (where CEM is certified under federal performance specifications).	4-CEM Detected Violation	>24 hour averaging period		Any violation of the applicable standard.	N/A	
M4A	Violation of opacity standards (0-20%) via Continuous Opacity Monitoring (COM).	Violation of applicable standards (opacity), reference HPV Policy Matrix Criteria 4A, continuous opacity monitoring. [2]	Continuous Opacity Monitoring (COM)	5-Opacity Violations	0-20% opacity		>5% opacity over the limit	FOR	>5% of the operating time during the reporting period. [4] [6]
M4B	Violations of opacity standards >3% of operating time via Continuous Opacity Monitoring during two consecutive reporting periods.		Continuous Opacity Monitoring (COM)	5-Opacity Violations	0-20% opacity		>5% opacity over the limit		
M4C	Violation of opacity standards (> 20%) via Continuous Opacity Monitoring (COM) for >5% of operating Time.		Continuous Opacity Monitoring (COM)	5-Opacity Violations	> 20% opacity		>10% opacity over the limit	FOR	>5% of the operating time during the reporting period. 4 6
M4D	Violation of opacity standards (>20%) via Continuous Opacity Monitoring (COM) for 5% operating time.		Continuous Opacity Monitoring (COM)		> 20% opacity		>10% opacity over the limit		

HPV MATRIX CODES

MATRIX CODE	AFS DESCRIPTION	VIOLATION	METHOD OF DETECTION	MAPS TO POLICY MATRIX #	STANDARD	SUPPLEMENTAL SIGNIFICANT THRESHOLD[1]	% IN EXCESS OF REFERENCE LIMIT/PARAMETER		% OF TIME IN EXCESS OF REFERENCE LIMIT
M4E	Violation of opacity standards (0-20%) via Method 9 VE Readings.	Violation of applicable standards (opacity), reference HPV Policy Matrix Criteria 4B, Method 9 Visual Emissions Readings. [2]	Method 9 VE Readings	5-Opacity Violations	0-20% opacity		>50% over limit	AND	Any violation of SIP/NSPS limits. [5]
M4F	Violation of opacity standards (>20%) via Method 9 VE Readings.	Violation of applicable opacity standards (averaging period of 6-minute block averages), reference HPV Matrix Criteria 5.	Method 9 VE Readings	5-Opacity Violations	> 20% opacity		>25% over limit	AND	
DIS	Discretionary HPV	HPV definition subject to mutual agreement of the State/Local Agency and EPA.	Mutual Agreement	Not Applicable--Discretionary	Can be major or minor source				

Footnotes:

1. Supplemental Significant Threshold is based on PSD significant levels. The significant threshold value is the lb/hr emission rate at 8760 hours which would result in PSD review.

2. Based on the applicable averaging period (e.g. 6-minute block averages).

3. For the first reporting period. If exceedance of the operating time during the first reporting period evaluated, and if such exceedances continue during the subsequent consecutive reporting period, the exceedances will be considered high priority violations for both reporting periods if the percent of time in excess exceeds 25% of the operating time during the second reporting period.

4. For the first reporting period. If exceedances occur for more than 3% of the operating time during the first reporting period evaluated, and if such exceedances continue during the subsequent consecutive reporting period, the exceedances will be considered high priority violations for both reporting periods if the percent of time in excess exceeds 3% of the operating time

during the second reporting period.

5. Unless the state or local agency concludes that 1) the cause of the violation has been corrected within 30 days and the source has returned to compliance, are 2) the source was in compliance with an applicable mass limit at the time the Method 9 visual reading was taken.

6. This would not include any federally approved exempt period (e.g., startup/shutdown/malfunction 40 CFR 60.11), since these would not be violations.

12. High Priority Violator (HPV) Lead Changes:

LEAD CHANGE DEFINITION: Lead changes (From Federal to State lead, from State to Federal Lead, or Joint Lead) on a violation may be made at any time. Timely and appropriate enforcement is extended to 300 days in case of a lead change. Cases may be assumed by EPA if addressing/resolution actions have not taken place by Day 270. Lead changes are added to an existing pathway and DO NOT change the day zero action date.

AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalents of:**
	DY Lead Changed to Federal Enforcement
	DB Lead Changed to Shared Enforcement
	DS Lead Changed to State Enforcement
	2B Shared Enforcement Lead (Joint)
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Date of lead change.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	Not required.
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	**Encouraged, lead pollutant should be reported.**
CONTRACTOR ID:	Not required
RDE 16	Not required.

ACTION LINKING FOR HPV CASES IS REQUIRED.

13. High Priority Violator (HPV) Addressing and Resolving Actions:

ADDRESSING ACTION DEFINITION: By Day 270 (if there has been no lead change), the violation should be either Resolved or Addressed. Addressing Actions include: Administrative Orders, Civil or Criminal Referrals, Administratively Addressed with No Formal Enforcement Action, SIP Revisions, Civil or Criminal Actions or Administrative Penalty Orders. In the case of a civil or criminal referral, an additional action of "OT" Other Addressing Action will need to be entered and linked to the Day Zero. As the Civil and Criminal Referral action types are Enforcement Sensitive, the OT action will ensure that the violation is correctly addressed in extracts to systems like the Online Targeting Information System (OTIS) and the Enforcement Compliance History Online (ECHO) system. Addressed violations *could* have a compliance status change from violation to meeting schedule. **HPVs addressed but not resolved need to reflect a compliance status of noncompliance or meeting schedule.** See the following chart for a list of addressing and resolving action types.

VIOLATION RESOLVED DEFINITION: Source compliance is confirmed, all penalties are collected, all activity identified in a Supplemental Enforcement Project (SEP) and all injunctive relief is completed. **After action reporting and linking, compliance status should be returned to compliance.** See the following chart for a list of addressing and resolving action types.

AFS REPORTING FOR ADDRESSING AND RESOLVING ACTIONS:

AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalents of action types on the following chart**
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Required. Date determined by activity.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	**Assessed cash penalties on the formal enforcement addressing action** (not the resolving action).
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	**Encouraged, lead pollutant should be reported on the Day Zero action.**
CONTRACTOR ID:	Not required
RDE 16	Not required.

ACTION LINKING FOR HPV CASES IS REQUIRED.

NATIONAL ACTION TYPES FOR ADDRESSING OR RESOLVING HIGH PRIORITY VIOLATOR CASES IN AFS			
ACT	DESCRIPTION	ADDRESS	RESOLVE
C3	EPA 113(D) ADMIN PENALTY COLLECTED		X
C7	CLOSEOUT MEMO ISSUED		X
OT	OTHER ADDRESSING ACTION (USED IN CONJUNCTION WITH CIVIL REFERRALS)	X	
VR	VIOLATION RESOLVED		X
WD	EPA 113(D) WITHDRAWN		X
2D	STATE COURT CONSENT DECREE	X	
2K	COMPL BY STATE, NO ACTION REQUIRED (ADMINISTRATIVELY RESOLVED-NO FORMAL ENFORCEMENT ACTION)		X
2L	PROPOSED SIP REVISION WILL LEAD TO COMPLIANCE	X	
2M	PROPOSED SIP/FIP REVISION WILL LEAD TO COMPLIANCE	X	
6B	EPA COURT CONSENT DECREE	X	
7F	EPA 113(D) APO COMPLAINT FILED	X	
7G	COMPL BY EPA, NO ACTION REQUIRED (ADMINISTRATIVELY RESOLVED-NO FORMAL ENFORCEMENT ACTION)		X
8A	EPA 113(A) ORDER ISSUED	X	
8C	STATE ADMIN ORDER ISSUED	X	
9C	STATE CIVIL ACTION	X	

14. Non-HPV Day Zero:

This action type starts a pathway for non-HPV instances. The linkage feature of AFS has proven to be very versatile and useful, and users had requested the ability to link up like actions similar to the HPV pathways. This use of this action type is not mandatory and is available at user discretion. The 620 report provides the choice of a Non-HPV pathway, so a pathway summary report can be generated.

USE OF THIS ACTION TYPE IS OPTIONAL

AIR PROGRAM CODE(S):	**Required, should reflect the applicable air programs**
ACTION TYPE:	**Regional equivalents of:**
	NH-Non-HPV Day Zero
DATE SCHEDULED:	Optional
DATE ACHIEVED:	**Date Achieved or Schedule is mandatory.**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	Not required.
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Not required
CONTRACTOR ID:	Not required
RDE 16	Not required.

ACTION LINKING IS REQUIRED WHEN USING THIS OPTIONAL ACTION TYPE.

15. Dropped HPV Cases

There are instances when a violation is dropped with no further enforcement activity. The source may or may not be in compliance. If the source is not in compliance the use of the National Action Types 2K/7G-Source Returned to Compliance by State/EPA, is not appropriate. In this instance, the National Action Type C7-Closeout Memo Issued, is recommended for closing out the pathway. The memo referred to in the action type does not have to a formal memorandum or letter to the source involved, it is assumed to be an accounting of the reasons for dropping enforcement action.

16. Title V Annual Compliance Certifications Date Due and Received

DEFINITION: As required by the Compliance Monitoring Strategy (CMS) of April 2001, Regions shall enter the date a Title V Annual Compliance Certification (ACC) is due and received unless otherwise negotiated. Due dates are normally determined by the Permit Authority and may reflect a grace period before a source is considered to be late in submitting the ACC. Received dates are post mark dates on the ACC. In case of electronic submission, the

date received is the date submitted to the reviewing agency. Compliance status is to be reported in the Results Code field: MC=Compliance, MV=Violation, MU=Unknown. Deviations are to be reported by EPA in the RDE8 field: Y=Yes, N=No, or a number of deviations reported may be entered.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	**Required, Should reflect "V" for Title V**
ACTION TYPE:	**Regional equivalents of:**
	CC EPA TV ACC Due/Received
	CB Permit Authority TV ACC Due/Receive (as negotiated)
DATE SCHEDULED:	**Due Date, determined by Permitting Authority**
DATE ACHIEVED:	**Received date, should reflect the post mark on the certification.**
RESULTS CODE:	**Required by EPA, reports compliance: MC=Compliance**
	MV=Violation
	MU=Unknown
PENALTY AMOUNT:	Not required.
RDE8:	**Required by EPA, reports deviations:**
	Y=Yes
	N=No
	Or number of deviations may be reported.
	State/Local agencies are encouraged to report this information, but it is not required.
STAFF CODE:	Not required
POLLUTANT CODE:	Not required.
CONTRACTOR ID:	Not required
RDE 16	Not required.

17. Title V Annual Compliance Certification Reviews:

As required by the Compliance Monitoring Strategy (CMS) of April 2001, EPA or State/Local Agency review of an annual compliance certification submitted by a source which is permitted under Title V of the Clean Air Act as amended in 1990. Compliance status is to be reported in the Results Code field: MC=Compliance, MV=Violation, MU=Unknown. Deviations are to be reported by EPA in the RDE8 field: Y=Yes, N=No, or a number of deviations reported may be entered.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	**Required, Should reflect "V" for Title V**
ACTION TYPE:	**Regional equivalents of:**
	ER Compliance Certification EPA Review
	SR Compliance Certification State Review
DATE SCHEDULED:	Not Required
DATE ACHIEVED:	**Date of Review.**
RESULTS CODE:	**Required by EPA, reports compliance:**
	MC=Compliance
	MV=Violation
	MU=Unknown
PENALTY AMOUNT:	Not required.
RDE8:	**Required by EPA, reports deviations:**
	Y=Yes
	N=No
	Or number of deviations may be reported.
STAFF CODE:	Not required
POLLUTANT CODE:	Not required.
CONTRACTOR ID:	Not required
RDE 16	Not required.

18. Tracking Full Compliance Evaluation Pathways in AFS:

AFS has the capability to track individual activities that lead up to the completion of a Full Compliance Evaluation (FCE) using the same process in place for tracking High Priority Violators (HPVs). By use of a special FCE Pathway Action Type, the individual components of the FCE can be documented.

Four new National Action Types have been incorporated into the AFS action tables to allow for the tracking of FCE components:

- 5E EPA On-Site FCE Pathway
- 5F EPA Off-Site FCE Pathway
- 5G State On-Site FCE Pathway
- 5H State Off-Site FCE Pathway

Once an FCE Pathway has been established, the user can link related activities leading up to the completion of an FCE.

Additionally, the AFS 620 Fixed Report can be used to facilitate tracking:

```
DATE  :  06/12/06          AIRS FACILITY SUBSYSTEM                PGM:  AFP620
                             SELECTION CRITERIA                   MAP:  AFM6201
==============================================================================
REPORT NAME:  AFS PATHWAY SUMMARY REPORT                CRITERIA NAME:
OPTIONAL TITLE:  ____________________________________________________________

ENTER 'X' TO SELECT PATHWAYS (*) AND SPECIFY DATA SELECTION VALUES:

* VIOLATION:   _ STATE DAY 0  _ FEDERAL DAY 0  _ NON-HPV DAY 0
               _ ADDRESSED    _ UNADDRESSED      _ RESOLVED
  VIOLATING POLLUTANTS:   _____  _____  _____  _____  _____

* ADMINISTRATIVE ORDER:     _ EPA 113(A) ORDER   _ STATE ADMIN ORDER
* CONSENT DECREE:           _ STATE COURT ORDER  _ FEDERAL COURT ORDER

* ADMINISTRATIVE PENALTY:  _  EPA 113(D) ADMIN COMPLAINT

* FULL COMP EVAL:  _ EPA ONSITE  _ EPA OFFSITE  _ STATE ONSITE  _ STATE OFFSITE

  KEY ACTION DATE ACHIEVED(YYMMDD):   ______ -  ______
  DOCUMENT NUMBER:   ______________    PAGE BREAK ON SOURCE (Y/N):
```

This will generate a report output for use:

```
DATE  : 06/12/06                    AFS PATHWAY SUMMARY REPORT - HPV PROGRAM                    PGM: AFP620
                                                                                               PAGE:     2
                                      ENFORCEMENT SENSITIVE DATA INCLUDED
=================================================================================================================
                                     FULL COMPLIANCE EVALUATION (FCE) PATHWAY
=================================================================================================================
STATE/CNTY/CDS ID                   STAFF NAME       DOCUMENT NUMBER  KEY ACTION
PLANT NAME                          STATE REGIST                      LINKED ACTION(S)
STREET ADDRESS
CITY                                                                                        DATE      DATE
RDE 16                                                                NUM  TYPE  DESCRIPTION     SCHED     ACHVD
=================================================================================================================
19/777/BETSY                                                          001   OG  S/L ONSITE PATH   /  /    05/10/01
BETSY'S TEST PLANT                                                    002   AT  OBSERVE PCE -ST   /  /    05/12/08
123 MAIN                                                              003   AW  PROCESS PCE -ST   /  /    06/04/02
METCALF                                                               004   AX  PCE/OFFSITE- ST   /  /    06/05/22
                                                                      005   SR  TV STATE REVIEW   /  /    06/06/12
                                                                      006   AS  FCE/ONSITE - ST   /  /    06/06/16
COMMENT:
```

Please keep in mind that use of the FCE pathway will NOT:

- Trigger any HPV flag generation,
- Generate any compliance status values,

- Generate Days Unaddressed or Days Used to Address, as these are not appropriate for this pathway,
- Generate an FCE action type.

19. Reporting Non-Applicability Determinations

Each year Regions are required to provide a schedule of activity to be completed that are used for reporting of Government Performance and Results Act (GPRA) activities. Regions may commit to the completion of particular air toxics activities, only to find out that the source intended for review, evaluation or investigation is actually not subject to the particular program requirements. The addition of the non-applicability action types provide a way for the Regions to report Air Toxic or NSR/PSD FCEs, PCEs, and/or investigations at facilities that turned out not to be subject to the particular MACT subpart or NSR/PSD activity targeted for evaluation or investigation. For further information on GPRA go to: http://www.whitehouse.gov/omb/mgmt-gpra/gplaw2m.html .

The following New National Action types for Federal use are available to reporting non-applicability determinations:

•**NA**-EPA MACT FCE/PCE Non-Applicability Determination
•**NM**-EPA MACT Non-Applicability Determination for Investigations
•**NN**-EPA NRS/PSD Non-Applicability Determination for Investigations

Non-Applicability actions should be reported as follows:

- Situation 1: If an FCE/PCE/Investigation finds that the MACT/NSR/PSD Air Program is not applicable:
  - Report the appropriate FCE/PCE/Investigation code to document your work, using an appropriate air program code (Title V or SIP).
  - Also enter the appropriate non-applicability action type (NA/NM/NN) to document non-applicability.

- Situation 2: If an FCE/PCE/Investigation finds that a certain subpart is not applicable, but other MACT subparts are:
  - Report the appropriate FCE/PCE/Investigation code using the MACT air program code (M). This documents the FCE/PCE/Investigation work for applicable MACTs.
  - **Also** enter the appropriate non-applicability action type (NA/NM) and note the **non-applicable subpart in the RDE 16 field**.

AFS REPORTING:	**REQUIRED REPORTING–RECAP**
AIR PROGRAM CODE(S):	**Required, use appropriate codes as described above**
ACTION TYPE:	**Regional equivalents of:**

	NA-EPA MACT FCE/PCE Non-Applicability Determination **NM**-EPA MACT Non-Applicability Determination for Investigations **NN**-EPA NRS/PSD Non-Applicability Determination for Investigations **And applicable FCE/PCE/Investigation actions types as described above**
DATE SCHEDULED:	Not Required
DATE ACHIEVED:	**Date of Activity**
RESULTS CODE:	Not required.
PENALTY AMOUNT:	Not required.
RDE8:	Not required.
STAFF CODE:	Not required
POLLUTANT CODE:	Not required.
CONTRACTOR ID:	Not required
RDE 16	**Non-Applicability subpart(s) for actions NA/NM.**

SECTION 4 SECURITY AND AFS

A. EPA's SECURITY MEASURES FOR AFS

AFS supports EPA, as well as State and local agencies, needing information to carry out air compliance management programs. All AFS users must ensure that the AFS application and its data are protected from loss, misuse, and unauthorized access or modification. These security measures for AFS are intended to protect the air compliance data that State and local agencies periodically submit to EPA. This protection includes measures to protect against unauthorized modification or loss of data, while at the same time protecting the underlying computer system that EPA operates.

There are certain security practices and procedures that should be followed to minimize the potential misuse or damage to the AFS database. Some of these include:

> ***Be familiar with the security policies and practices*** involving the AFS application, especially those for confidential or sensitive information.
>
> ***Maintain security for the application*** by correctly using established security mechanisms (use of unique user ID and password) and practices when accessing the AFS application.
>
> ***Do not attempt to view, change, or delete*** *data* unless you are authorized to do so.
>
> Do not use ***your system privileges to obtain data/files or run applications for anyone*** who is not authorized to view or use data that are sensitive.
>
> ***Be alert*** to potential threats to corrupt or destroy the AFS application and database.
>
> Ensure that ***no one person has sole access to***, or control over, AFS information and processing resources.
>
> ***Guard user ID and password***. Do not loan out to others.

For more information on security practices and procedures to protect the database please refer to Appendix 6: Security and AFS

B. AFS CONTINGENCY PLANNING – WHAT TO DO IN A DISASTER

AFS Contingency Planning
Standard Operating Procedures

Background
The purpose of the AFS contingency plan is to ensure that AFS data is available in the event of a disaster. The AFS is critical to performing a primary EPA mission which is to support the air compliance/enforcement program. As a result, the AFS must be available within 15-30 days following a catastrophic disaster to avoid impairment of EPA's long-term ability to accomplish its mission.

Introduction
This standard operating procedures (SOP) document was compiled to provide guidance to AFS users on the steps necessary to support a continuity of operations in the event of a disruption resulting in the inaccessibility of the AFS.

Disruptions Affecting AFS
An emergency affecting the accessibility of AFS can vary from being a temporary disruption that is quickly rectified with minimal impact, to a catastrophic disruption resulting in great amounts of time where AFS is not available. Different types of disruptions fall within the following categories:

Category	Length of Time AFS is Unavailable	Example Cause
Temporary Disruption	3 working days or less	Minor software failure due to improper installation
Major Disruption	3-14 working days	Software/hardware malfunctions, Malfunction to NCC support due to severe inclement weather
Catastrophic Disruption	>15 working days	Complete failure of support due to security breach, communication failure

Standard Operating Procedures
For disruptions lasting less than 15 days, you will need to input your data immediately when you have been informed that the AFS is back in operation and accessible. However, for disruptions that are 15 days and greater, there are 5 steps that you should take to implement contingency planning:

Step 1: Notify the Appropriate Personnel
If you notice that the AFS is not available when you attempt to log on please contact someone immediately. Please see *Section 8: AFS Contacts* for a listing of key persons that you should contact.

Step 2: Check Information Sources for Updates
Refer to the available information sources for updates to know the status of the disruption. You should check:

1. Your phone and/or email
2. AFS Helpline
3. AFS Mainframe Bulletin Board – assuming you were able to finally log in
4. AFS Regional Compliance Manager
5. AFS Website

Step 3: Document Your Agency's AFS Data
Independent of whether or not AFS is accessible, data must be collected according to the latest issuance of the AFS Information Collection Request. Be sure to label sensitive data appropriately.

- Batch users, including Universal Interface users, will continue to create batch update files as usual. Batch users of AFS will be asked to hold future submittals until NCC is restored or an alternative reporting platform is supplied. Batch users may also be asked to generate activity reports from their own systems to ensure a flow of information to the EPA Regional and Headquarters offices.

- Direct users of AFS will be requested to maintain records of activity defined as reportable to AFS. These data elements are defined by the minimum data requirements as listed in the AFS Information Collection Request (ICR) which was approved by the Office of Management and Budget. Direct users will enter their data into the AFS Contingency Planning Worksheet spreadsheets (Appendix 10: AFS Contingency Planning Data Entry Form), either electronically or hardcopy format.

Step 4: Submit Data to EPA at Scheduled Intervals
Data should be submitted to your Regional AFS Compliance Managers at scheduled intervals. Those intervals must fall within the 60 day time frame as specified in the AFS ICR. For further clarification and guidance on the types of data to be submitted, please refer to the Clean Air Act Federally Reportable Violation Clarification document and the AFS Information collection Request Minimum Data Requirements document. States and local agencies should submit their data to EPA headquarters and copy their Regional Compliance Manager. Data submissions should be submitted via email. However, if the email system is unavailable, data submissions should be sent via postal mail. Please review the checklist below for a listing of the data elements that must be included in the submission to your Regional AFS Compliance Manager and to EPA HQ.

Data Element Submission Checklist

Plant General Record: New Plants or Changes to Existing Plant Records

- ❏ AFS ID
- ❏ Name
- ❏ Street
- ❏ City
- ❏ County
- ❏ State
- ❏ Zip
- ❏ SIC or NAICS
- ❏ Government Use Code
- ❏ Applicable Air Programs
- ❏ Air Program Operating Status
- ❏ All Applicable Subparts
- ❏ Air Program Pollutants
- ❏ Air Program Pollutants w/ Classification
- ❏ Compliance Status
- ❏ Attainment / Nonattainment Indicator

HPV Information

Pathways Should be Tracked with:

- ❏ Discovery Date
- ❏ Day Zero
- ❏ Date Addressed
- ❏ Date Resolved
- ❏ Violation Type
- ❏ Violating Pollutants

Actions Reportable Under '07 ICR

- ❏ Full Compliance Evaluations
- ❏ Stack Tests
- ❏ Annual Title V Compliance Certifications
- ❏ Investigations
- ❏ Notices of Violation
- ❏ Formal Enforcement Actions including Consent Decrees
- ❏ Administrative Orders
- ❏ Civil Referrals
- ❏ Criminal Referrals

Actions Should Include:

- ❏ Applicable Air Programs
- ❏ Action Types
- ❏ Date Achieved
- ❏ Date Scheduled
- ❏ RDE8 field
- ❏ Penalties
- ❏ Results Code

Compliance Monitoring Information

- ❏ Update to CMS plan as needed

The following activity reports may also be requested:

Number of Full Compliance Evaluations completed during a specified time frame.
Number of Stack Tests observed or reviewed during a specified time frame.
Number of Notices of Violation completed during a specified time frame.
Number of Enforcement Actions taken during a specified time frame.
Specified HPV activity during a specified time frame.

Step 5: Resume Normal Operations upon Notification that the System has been Rectified
AFS does not subscribe to the NCC Disaster Recovery Planning service and as a result the AFS will assume restoration of services as soon as is possible for NCC support to restore the system and its functions. Upon notification that AFS is functional, the respective state/local agency is required to submit their batch input files into the AFS system. To avoid accidental duplicate data entry, the state/local agency should inform their Regional AFS Compliance Manager about their data submittal to AFS.

C. GUIDELINES FOR HANDLING ENFORCEMENT SENSITIVE DATA

It is paramount that any sensitive information (e.g., enforcement sensitive data) in the AFS application is protected from unauthorized access. Data that has been identified as enforcement sensitive includes:

National Action Type	Description
C2	113D APO recalculated
EI	EPA Investigation Initiated
SI	State Investigation Initiated
UB	113D Unmitigated Economic Benefit (OBSOLETE)
UC	113D Unmitigated Gravity Comp. (OBSOLETE)
US	113D Total Unmitigated Penalty (OBSOLETE)
1D	State Criminal Referral
1E	Civil Referral to State AG
3D	State Civil Penalty Assessed
4B	EPA Civil Referral
4F	Civil Referral Notification (OBSOLETE)
4H	Civil Referral Notification Deficiency by State (OBSOLETE)
4J	Civil Referral Substantive Violation by EPA (OBSOLETE)
4L	Civil Referral Substantive Violation by State (OBSOLETE)

Keep in mind the following:

- Be sure to ***provide only authorized personnel with sensitive data*** (whether the data are on your screen, on paper or in an electronic file).
- When viewing or processing confidential or sensitive data, ***be sure the PC is in a non-traffic area and that only persons authorized to see the data*** are in the area.
- ***Protect all documents, reports and files containing sensitive data***. Be sure that they are labeled "ENFORCEMENT-SENSITIVE."
- ***Destroy sensitive documents*** by shredding when finished with them.
- ***Safeguard*** sensitive data. Do not store to your hard drive, safeguard your diskettes.
- Log off your computer when you are away from your work station!
- Lock up or put away sensitive data.

SECTION 5 NATIONAL INITIATIVES

A. AIR TOXICS INITIATIVE

In February 2008, the Air Toxics Strategy Implementation Team approved the National Air Toxics Compliance and Enforcement Priority strategy. Tracking of this initiative will be dependent upon the accuracy of the data in AFS for Federal activities. The goal of the Air Toxics National Compliance and Enforcement Priority (FY08-10 Strategy) is for each EPA region to address eighty percent of the facilities in the regional selected MACT standard(s) within the National Problem Areas. The MACT Prioritization Tool on the OTIS web page will contain a page with the current status of completion for each Region. Data to populate this page will be extracted from AFS.

The National Problem Areas have been defined as Leak Detection and Repair (LDAR), industrial flares, and surface coating. Please see the attached table of applicable MACT subparts. Addressing is defined as:

- Determining through a partial or full compliance evaluation (PCE/FCE) that the facility is not subject to the selected MACT,
- Determining through an PCE or FCE that no further action is needed at this time,
- Determining through an Investigation that no further action is needed at this time,
- Issuing an administrative order or administrative penalty order,
- Referring a case to the Department of Justice (DOJ).

To track this priority in AFS, EPA regions will have to provide the following information:

1. Source Universe Identification: Identification of an Air Toxics source universe that can be retrieved from AFS. Field AMBM on the Plant General record will be used to identify sources within this initiative.
2. Appropriate Subpart Identification.
3. Unique action types to identify air toxics initiatives.
4. Identification in an action record to identify if no further action is needed.

Specific Data Requirement**s:**

1. Source Universe Identification: The Air Toxics source universe identification shall be maintained via the use of the AMBM code on the Plant General record. This field, previously used to document ambient monitoring, will be renamed “Air Toxic Initiative”. It is a one-digit alpha-numeric field where each Region will identify the appropriate Air Toxics source universe. A national code table has been created based on the initiatives that have been chosen by the regions and is available in AFS utilities.

2. Appropriate Subparts: Sources subject to the initiative should have the appropriate subpart entered on the MACT air program record:

Surface Coating MACTs

Auto and Light Duty Truck (IIII)
Fabric, Printing, Coating and Dying (OOOO)
Large Appliances (NNNN)
Magnetic Tape (EE)
Metal Can (KKKK)
Metal Coil (SSSS)
Metal Furniture (RRRR)
Misc. Metal Parts and Products (MMMM)
Paper and Other Web (JJJJ)
Plastic Parts (PPPP)
Printing and Publishing (KK)
Shipbuilding and Ship Repair (II)
Wood Building Products (QQQQ)
Wood Furniture (JJ)

LDAR/Flare MACTs
Flexible Polyurethane Foam (III)
Gas Distribution (R)
Generic MACT (YY)
HON (H)
MON (FFFF)
Marine Vessal Loading (Y)
Misc. Coating Manufacturing (HHHHH)
Municipal Waste Landfill (AAAA)
Natural Gas Transmission and Storage (HHH)
Oil and Gas Production (HH)
Pesticide Active Ingredient (MMM)
Petroleum Refineries (CC)
Pharmaceutical (GGG)
Organic Liquids Distribution (EEEE)
Polymer and Resins, Group IV (JJJ)

3. Unique Action Data Entry: In order to identify activities that are part of this initiative, special action types will be created for the following activities and mapped to the appropriate National Action Types:

Action Type	Description	Equivalent To:
AA	FEDERAL AIR TOXICS ONSITE FCE	FE
AB	FEDERAL AIR TOXICS OFFSITE FCE	FZ
AC	FEDERAL AIR TOXICS ONSITE PCE	ES
AD	FEDERAL AIR TOXICS OFFSITE PCE	EX
AE	FEDERAL AIR TOXICS INVESTIGATION INITIATED	EI

AF	FEDERAL AIR TOXICS INVESTIGATION COMPLETED	EC
AG	FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	8A
AH	FEDERAL ADMINISTRATIVE PENALTY ORDER	7F
AI	FEDERAL AIR TOXICS REFERRAL TO DOJ	4B
AJ	NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	NA

All Regions are asked to map equivalent actions into their action tables. Regions that have already entered data into AFS for FY08 that are applicable to this initiative will need to change the action type in the existing action record.

4. Results Code: In order to identify if no further action is needed, a unique results code will be needed in each Air Toxics Initiative action record (RSC1). When an FCE, PCE, or Investigation is completed and no further action is required (no enforcement action will be pursued), then a Results Code will provide the information needed to address the source within the initiative.

Results Code	Description
AN	NO FURTHER ACTION REQUIRED

B. OTHER NATIONAL INITIATIVES:

There is occasionally the need to identify work not consistent with air program definitions. National programs to track PSD/NSR review, Air Toxics, area sources and others requires the ability to identify several different kinds of sources in a unique manner to facilitate reporting and data analysis. Work is underway to create fields within AFS to supersede the use of the AMBM field currently used for the national Air Toxics Initiative and allow application of multiple national initiative universes. This effort is underway and not immediately available within AFS. New fields will be created at the Plant General and Action Records in order to identify the sources involved in different initiatives and applicable actions. Work is expected to be completed by FY2010.

SECTION 6 SUGGESTIONS FOR IMPROVING AFS

During the period of Business Rules compilation (Fiscal Years 03 and 04), several recommendations were made concerning the improvement of AFS:

- Many agencies track compliance status by source, not by air program pollutant. Requests to discontinue tracking at the air program pollutant level have been submitted not only during the Business Rules process, but during the AFS Needs Analysis completed in FY02. The air program requires the identification of the pollutant in violation, but an effort to streamline data reporting is being included in modernization efforts.
    - UPDATE: The compliance monitoring and enforcement program for the oversight of CAA stationary sources requires a compliance status based on pollutant regulations. The EPA Regional Air Enforcement Managers have agreed to allow the modernized system to track noncompliance by pollutant, but not require a listing of pollutants by air program. This is expected to significantly streamline data entry.
- Many agencies do not agree that compliance status should be tracked by disposition of enforcement activity. It was reported during conference calls that many agencies consider physical compliance a more reliable way to track compliance with the Act. Sources with unresolved High Priority Violator cases physically in compliance with the Act will be listed as “Meeting Schedule” or “In Violation” until all injunctive relief or penalties are paid. An AFS Workgroup to study Compliance Status has been formed with an expected output in late FY04/early FY05.
    - UPDATE: Although a workgroup was formed to study this issue, no clear findings were compiled. Violators will be listed in violation with regulations until all requirements for compliance are met. The modernization of AFS will introduce additional fields where reporters can indicate that a facility is meeting all pollutant requirements, but might have outstanding enforcement responsibilities such as penalties, equipment installation schedules, or other injunctive relief.
- Many agencies are reporting a Notice of Violation with a proposed penalty, or stipulated penalty. These actions are being counted as a Notice of Violation, but should also be reported as an Administrative Order with Penalty. This compendium advises that any NOV with penalty be reported as two separate actions: an NOV and an Administrative Order.
    - UPDATE: AFS has provided guidance and training in this area, along with presentations at the FY06 and FY07 National AFS Workshops requiring appropriate reporting for this enforcement situation.
- Guidance has been requested for the reporting of Civil Actions by both Federal and State users of AFS. Action types defined as “Civil Action” for filing a complaint are being used to report settlements. New action types for state or district filings have been requested. An AFS Workgroup to study Enforcement Actions has been formed with an

expected output in late FY04/early FY05. In addition, this group will study the reporting of penalty data and reporting information on appealed enforcement cases.

- UPDATE: Optional enforcement actions for state use were entered into AFS. The tracking of appealed cases has been set aside for action during the design phase of a new system. The creation of fields necessary to track this information is too cost prohibitive for current AFS.

- Penalty data is not being reported consistently across the country. Values from injunctive relief and Supplemental Environmental Projects are being added to the penalty field, which is designed to reflect assessed cash penalties only. In cases of court decisions affecting multiple locations, policy for distribution of penalty has been requested. Additionally, penalty amounts are not being reported on the official enforcement action, and are being reported under an action type "Penalty Paid", thus not captured in RECAP analyses.
  - UPDATE: Data quality activities have been put into place to review reported penalties. The new acronym AAPA-Addressing Action Penalty Amount, provides a retrievable field for identifying penalties in HPV cases, to facilitate review of data.
- Guidance is needed for the reporting of appealed cases, where changes in the final penalty have been made.
  - UPDATE: This category of enforcement reporting has been set aside for action during the design of a new system. The creation of fields necessary to track this information is too cost prohibitive for current AFS.
- There are areas where the appropriate air program codes are not being reported. Specifically, Title V applicability, New Source Review (NSR) and Prevention of Significant Deterioration (PSD) air programs are not being identified. The correct reporting of air program codes should be a priority of Regional AFS Compliance Managers for data accuracy.
  - UPDATE: All Regional AFS Compliance Managers are responsible for the accuracy of the air program code universe in their delegated region.
- One Region asked for the ability to track emission credits and trading.
  - UPDATE: This category of enforcement reporting has been set aside for action during the design of a new system. The creation of fields necessary to track this information is too cost prohibitive for current AFS.
- One Region asked for stack test results (Pass or Fail) to be written into AFS code making the information mandatory for reporting on the action type. This type of functionality is being considered in ongoing modernization efforts.
  - UPDATE: Stack Test Pass/Fail/Pending codes are reportable MDRs to AFS. Additional programming can be reviewed during the design phase of modernization.
- One Region has asked for recommended procedures for change of ownership–issues of culpability have been raised and at least one local agency refuses to saddle a new owner with the compliance history of past ownership.

- UPDATE: AFS is a system reporting on the CAA management at stationary sources. The definition of a stationary source is anything within the facility fence lines. Ownership may change, but land use and previous problems are inherited with the facility.

- Guidance has been requested for reporting of stack test failures.
  - UPDATE: Stack Test Guidance was compiled in 2005 and an update to the guidance is scheduled for release in 2009.

SECTION 7 AFS DOCUMENTATION

Current documentation used for reporting data to AFS:

Document Name/Web Site

Compliance Monitoring Strategy AFS Technical Support Document
http://www.epa.gov/compliance/resources/publications/data/systems/air/cmstechman.pdf

The Timely & Appropriate Response to High Priority Violators
http://www.epa.gov/compliance/resources/policies/civil/caa/stationary/hpvmanualrevised.pdf

AFS National Action Types
http://www.epa.gov/compliance/resources/publications/data/systems/air/actions.pdf

List of Minimum Data Requirements (MDRs)
http://www.epa.gov/compliance/resources/publications/data/systems/air/mdrshort.pdf

AF1: Data Dictionary
http://www.epa.gov/compliance/resources/publications/data/systems/air/af1.pdf

AF2 Data Coding Manual
http://www.epa.gov/compliance/resources/publications/data/systems/air/af2.pdf

AF3 Data Storage Manual
http://www.epa.gov/compliance/resources/publications/data/systems/air/af3.pdf

AFS Data Acronym Guides
http://www.epa.gov/compliance/resources/publications/data/systems/air/acronymacroname.pdf
http://www.epa.gov/compliance/resources/publications/data/systems/air/acronymfilename.pdf

AFS Universal Interface Operators Manual

SECTION 8 AFS CONTACTS

AFS CONTACTS		
Ms. Akachi Imegwu **AFS Security Manager** 1201 Pennsylvania Ave, NW Washington DC, 20460 Direct Phone (202) 564 – 0045 Main Phone: (202) 272 – 0167 Toll Free: 1-866-411-4372 Fax (202) 564 – 0032 imegwu.akachi@epa.gov afs-support@epa.gov	**Ms. Betsy Metcalf** **AFS Systems Administrator** 1201 Pennsylvania Ave, NW Washington DC, 20460 Direct Phone (202) 564 – 5962 Main Phone: (202) 272 – 0167 Toll Free: 1-866-411-4372 Fax (202) 564 – 0032 metcalf.betsy@epa.gov afs-support@epa.gov	**TRC Environmental** **Contract Support Team** Helpline: 800-367-1044 Afshelpline@trcsolutions.com
AFS Website: http://www.epa.gov/compliance/contact/data-afscontacts.html		
Region 1 Ms. Beth Kudarauskas 1 Congress St. Suite 1100 Boston, MA 02114-2023 Direct Phone: (617) 918-1564 Fax (617) 918-0564 Toll free w/in R1: (888) 372-7341 Main Phone: (617) 918-1111 kudarauskas.beth@epa.gov	**Region 2** Mr. Phillip Ritz 290 Broadway New York, NY 10007-1866 Direct Phone (212) 637-4064 Fax (212) 637-3998 Main Phone: (212) 637-3000 ritz.phillip@epa.gov	**Region 2** Mr. Steve Carrea 290 Broadway New York, NY 10007-1866 Direct Phone (212)637-3498 Fax (212)637-3998 Main Phone: (212) 637-3000 carrea.steve@epa.gov
Region 3 Ms. Louvinia Madison-Glenn 1650 Arch Street Philadelphia, PA 19103-2029 Direct Phone: (215) 814-5704 Fax (215) 814-2134 Main Phone: (215) 814-5000 Toll free: (800) 438-2474 madison.louvinia@epa.gov	**Region 4** Mr. Ahmed Amanulah Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104 Direct Phone (404) 562-9209 Fax (404) 582-9164 Main Phone: (404) 562-9900 Toll free: (800) 241-1754 amanulah.ahmed@epa.gov	**Region 5** Ms. Lisa Holscher 77 West Jackson Boulevard Chicago, IL 60604-3507 Direct Phone (312) 886-6818 Fax (312) 353-8289 Main Phone: (312) 353-2000 Toll free w/in R5: (800) 621-8431 holscher.lisa@epa.gov
Region 6 Ms. Pam Elder-Schweers Fountain Place 12th Floor 1445 Ross Avenue Dallas, TX 75202-2733 Direct Phone: (214) 665-7463 Fax (214) 665-7446 Main Phone: (214) 665-2210 Toll free w/in R6: (800) 887-6063 elder-schweers.pam@epa.gov	**Region 7** Mr. Hugh "Joe" McCullough 901 North 5th Street Kansas City, KS 66101 Direct Phone (913) 551 – 7191 Main Phone: (913) 551-7003 Toll free: (800) 223-0425 Mccullough.hugh@epa.gov	**Region 8** Ms. Jocelyn Hoffman 1595 Wynkoop St. Denver, CO 80202-1129 Direct Phone (303) 312 – 6232 Main Phone: (303) 312-6312 Toll free: (800) 227-8917 Hoffman.jocelyn@epa.gov
Region 8 Mr. Jeff Mosal 1595 Wynkoop St. Denver, CO 80202-1129 Direct Phone (303) 312 – 6802 Main Phone: (303) 312-6312 Toll free: (800) 227-8917 mosal.jeffrey@epa.gov	**Region 9** Ms. Linda Barajas-Porter 75 Hawthorne Street San Francisco, CA 94105 Direct Phone (415) 947-4131 Fax (415) 947-3579 Main Phone: (415) 947-8000 Toll free w/in R9: (866) EPA-WEST barajas-porter.linda@epa.gov	**Region 9** Mr. John Borton 75 Hawthorne Street San Francisco, CA 94105 Direct Phone (415) 972-3985 Fax (415) 947-3579 Main Phone: (415) 947-8000 Toll free w/in R9: (866) EPA-WEST borton.john@epa.gov
Region 10 Ms. Laurie Kral		

1200 Sixth Avenue, Suite 900 Seattle, WA 98101 Direct Phone (206) 553-1868 Fax (206) 553-0110 Main Phone: (206) 553-1200 Toll free: (800) 424-4372 kral.laurie@epa.gov		

AFS BUSINESS RULES COMPENDIUM

APPENDICES

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Appendix 1

Compliance Monitoring Strategy Charts

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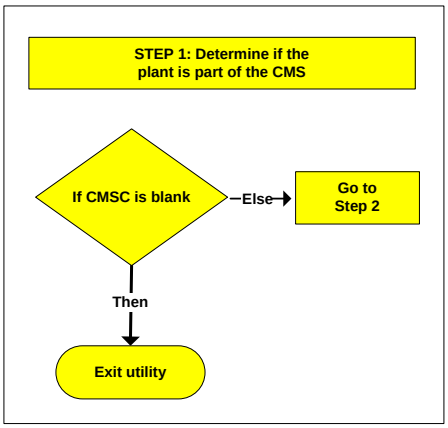
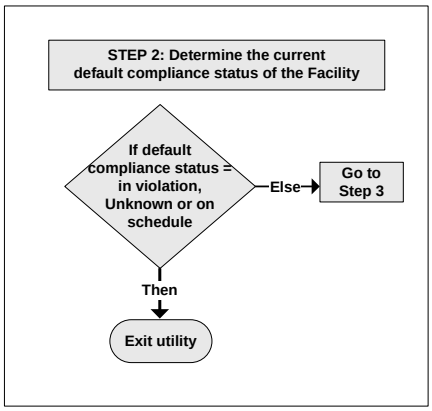
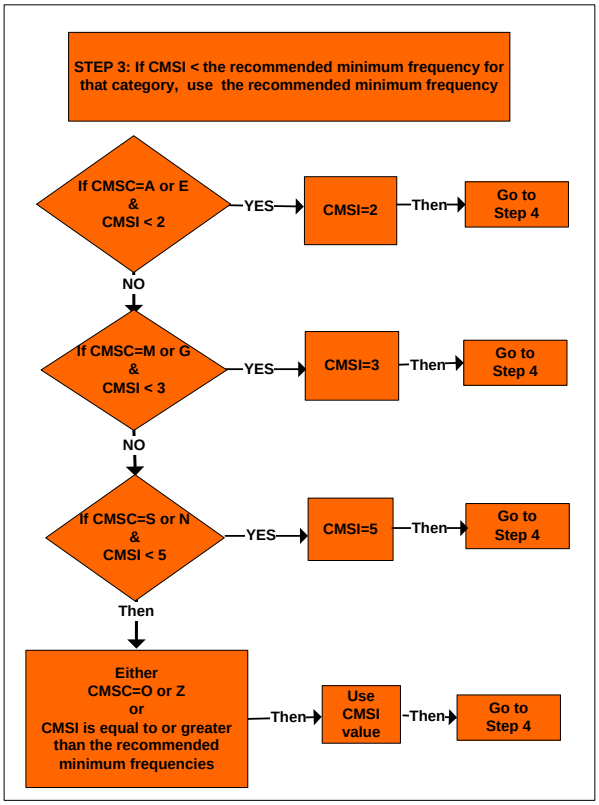
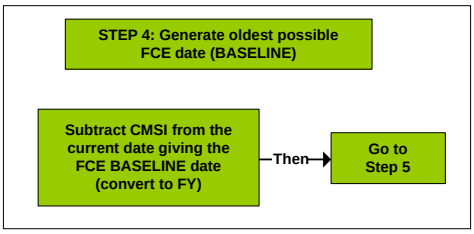
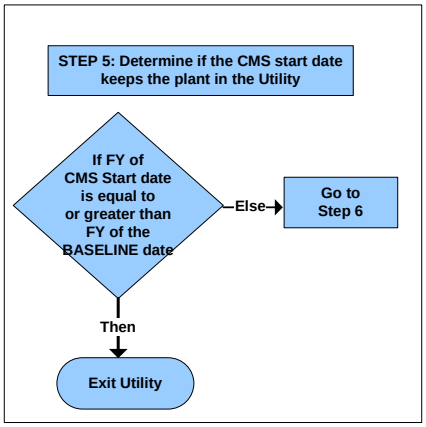
Generate Unknown Compliance Status Utility

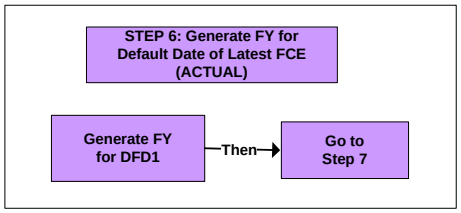


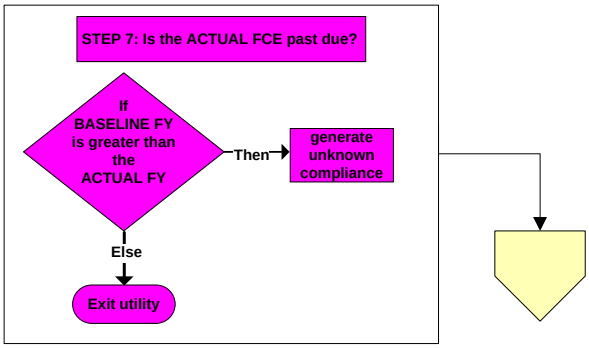




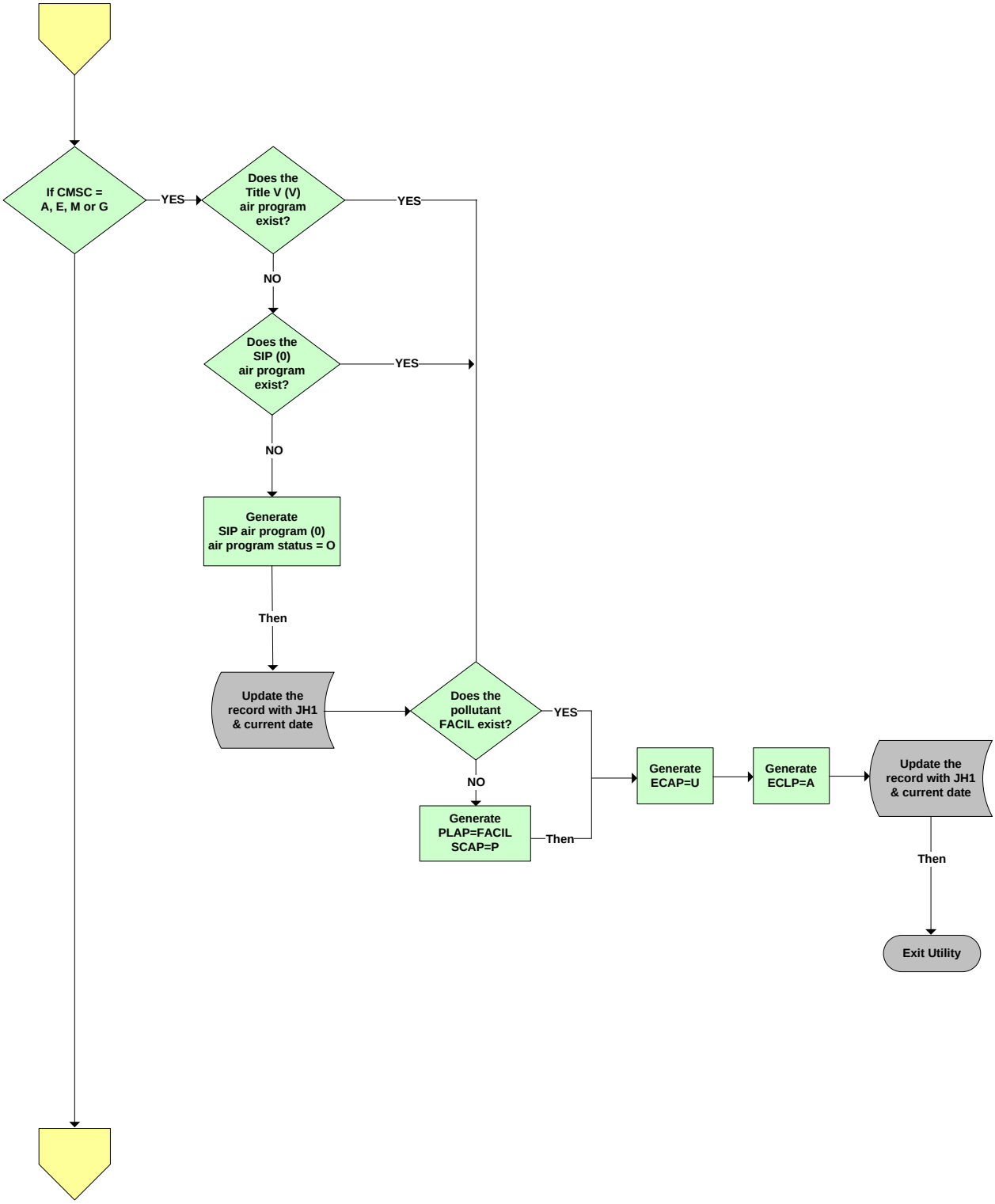




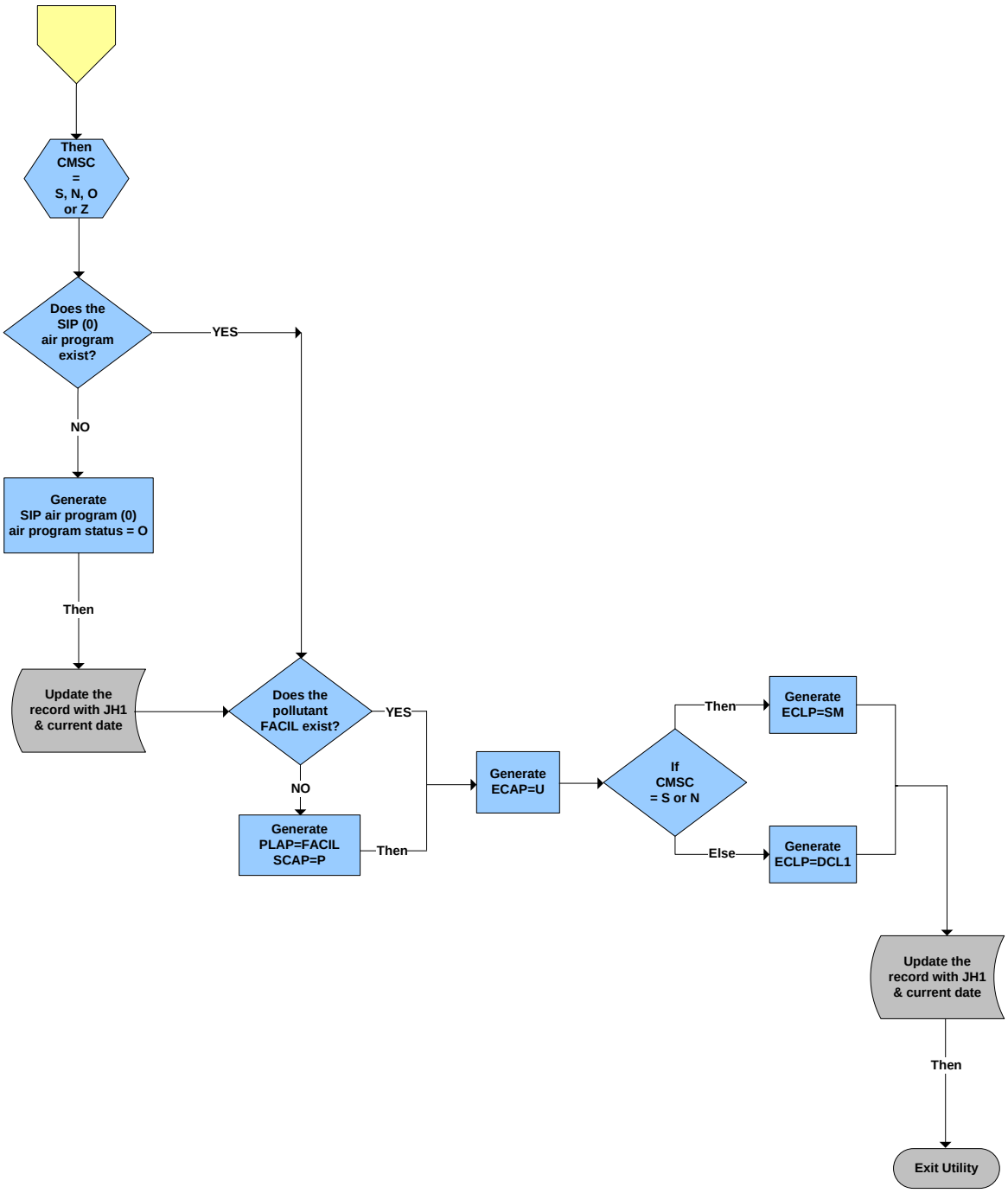




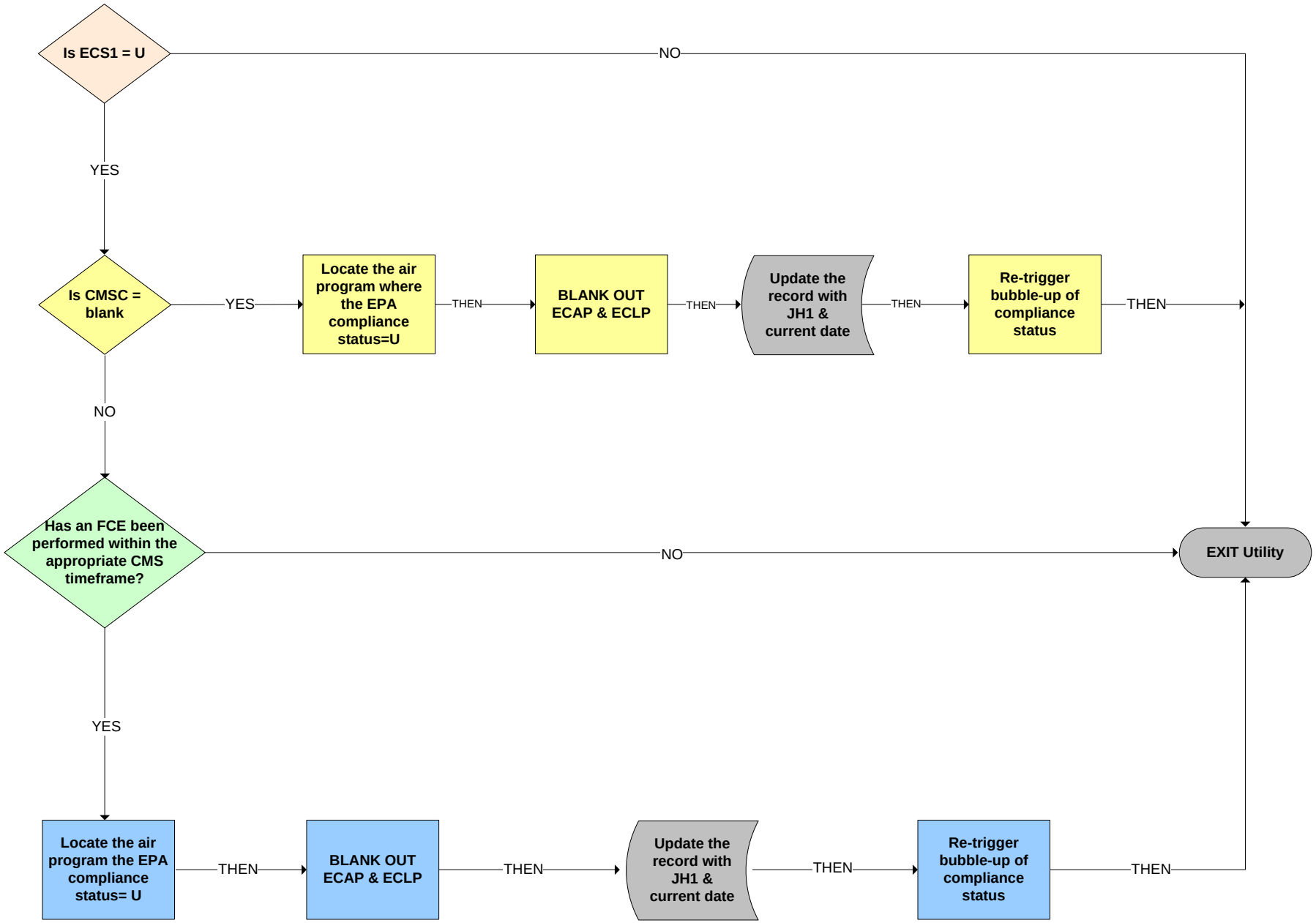
Generate Unknown Compliance Status Utility



Generate Unknown Compliance Status Utility



Ungenerate Unknown Compliance Status Utility



Effect on CMS Start Date when CMSC is modified

Description	current value CMSC	new value CMSC	Effect on CMS Start Date
Blank to anything	blank	A, E, M, G, S, N, O or Z	change to current date
Anything to blank	A, E, M, G, S, N, O or Z	blank	blank out
Downgrade to SM80 or Other	A, E, M or G	S, N, O or Z	do nothing
Upgrade to Major or Mega	S or N	A, E, M or G	change to current date
Downgrade to Other	S or N	O or Z	do nothing
Upgrade to any value	O or Z	A, E, M, G, S or N	change to current date

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Appendix 2

AFS Plant General Structure/Data Element Dictionary

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AFS BUSINESS RULES **DATE OF LAST UPDATE:**
STRUCTURE--PLANT GENERAL **03/02/09**
RECORDS IN BOLD TEXT ARE MINIMUM DATA REQUIREMENTS

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
AFS PLANT ID	A mandatory 15-digit code identifier for permit information for Permit Program Data Elements (PPDEs). This number must be unique within a county and requires the FIPS state and county codes to uniquely identify a plant in AFS.	PAFS	A	15.0	Most agencies use the SCSC acroynm number for populating PAFS (SSCCCPPPPP where S=FIPS State, C=FIPS County, and P=PCDS ID).		N
AFS PLANT IDENTIFICATION NUMBER	System generated. An internal number assigned to each plant in AFS.	PLNT	A/N	9.0	Was used in the ENVIROFACTS system to identify AFS linkages.		N
AIR PROGRAMS	System generated. Lists applicable air programs at a plant. Used in Ad Hoc reporting, lists all air program codes.	APCP	A	8.0			N
AIR QUALITY CONTROL REGION	A system generated field based on user-supplied plant, state, and county values identifying the Air Quality Control Region in which a plant is located.	AQCR	A	3.0			N
AIR TOXIC INITIATIVE	Federial Use for national initiative	AMBM	A	1.0			
CDS PLANT ID	**Mandatory 5-digit alphanumeric plant identifier for each plant in AFS. Uniquely identifies a source within a county.**	**PCDS**	**A**	**5.0**	**Most agencies number plants within a county sequentially as they are added to AFS.**		**Y**
CDS PLANT ID 1	This optional use field identifies the left (first) digit of the PCDS number. It is used in ad hoc retrievals.	PCD1	A	1.0	Some agencies use this acroynm to categorize plants.		N
CDS PLANT ID 2	This optional use field identifies the left two (first and second) digits of the PCDS number. It is used in ad hoc retrievals.	PCD2	A	2.0	Some agencies use this acroynm to categorize plants.		N
CDS PLANT ID 4	This optional use field identifies the four right most digits of the PCDS number. It is used in ad hoc retrievals.	PCD4	A	4.0	Some agencies use this acroynm to categorize plants.		N
CITY CODE	Optional use. A 5-digit FIPS city code used to identify the city in which a plant is located.	CYCD	A	5.0	Entry of either the City Code or City Name is mandatory. Reference the FIPS table in AFS Table File Lookup in the Utilities.		N
CLASSIFICATION CODE	System generated code that provides the plant default classification.	CLAS	A	5.0			N
COMPLIANCE STATUS	System generated code that provides the plant default compliance status.	CMST	A	5.0			N
CONTACT PERSON COMPLIANCE	The name of a person who is knowledgeable about the compliance information for the facility.	CTPC	A	20.0			N
CONTACT PERSON EMISSIONS	OBSOLETE	CTPE	A	20.0			OBSOLETE
CONTINUOUS EMISSIONS INDICATOR	A system generated field when records associated with Continuous Emissions Monitoring information are added or deleted for the plant. Valid value is Y=Yes.	CEM1	A	1.0	CEM data is not part of the MDRs.		N
COUNTY CODE	**Mandatory FIPS code used to identify the county in which a plant is located.**	**CNTY**	**A**	**3.0**	**Reference the FIPS table in AFS Table File Lookup in the Utilities.**		**Y**
COUNTY NAME	System generated field which identifies the county in which a plant is located.	CTNM	A	30.0	Reference the FIPS table in AFS Table File Lookup in the Utilities.		N
DATE DETERMINATION COMPLETED	OBSOLETE	MACD	A	8.0 50			OBSOLETE
DATE PLANT ADDED POST-CMS	A system generated field designed to maintain the date a plant has been added to AFS after the inception of the CMS. This field is used in calculations dealing with unknown compliance status.	DPAC	A	6.0			N

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
DATE PLANT INFO LAST UPDATED	System generated field containing the most current date on which changes were made to any record on the plant.	DTUP	A	6.0			N
DATE RECORD IS UPDATED	System generated field containing the most current date on which changes were made to the Plant General record.	DU11	A	6.0			N
DUN BRADSTREET NUMBER	Optional information, this identification number references the source within the Dun and Bradstreet business database. Update access to this field is limited to system administrators.	DBNO	A	9.0	Dun and Bradstreet numbers are not currently up to date in AFS.		N
E S CLASSIFICATION CODE	System generated default classification. This value is generated from the Air Program Pollutant values to reflect the highest emission level classification of criteria pollutants regulated by an air program. This value is generated regardless of Federal or State/Local agency values. Valid Values are: A=Major, SM=Synthetic Minor, B=Minor, C=Unknown.	DCL1	A	2.0	See the Air Program Pollutant records. Values A1 and A2 are obsolete.		N
E S CLASSIFICATION CODE DESC	System generated default classification. This description of the classification code is generated from the Air Program Pollutant values to reflect the highest emission level classification of criteria pollutants regulated by an air program. This value is generated regardless of Federal or State/Local agency values. Valid Values are: A=Major, SM=Synthetic Minor, B=Minor, C=Unknown.	DLD1	A	25.0			N
E S COMPLIANCE STATUS	A system generated default bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from either the state or federal value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	DCS1	A	1.0	ECHO interprets a source with a compliance status of On Schedule as in violation.		N
E S COMPLIANCE STATUS DESC	A system generated description of the default bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from either the state or federal value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	DDS1	A	25.0			N
EMERGENCY CONTROL PLAN	OBSOLETE	EMCP	A	1.0			OBSOLETE
EMERGENCY CONTROL PLAN DESC	OBSOLETE	EMCD	A	25.0			OBSOLETE

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
EPA CLASSIFICATION CODE	System generated Federal classification. This value is generated from the Air Program Pollutant values to reflect the highest emission level classification of criteria pollutants regulated by an air program. This value is generated from Federal values. Valid Values are: A=Major, SM=Synthetic Minor, B=Minor, C=Unknown.	ECL1	A	2.0			N
EPA CLASSIFICATION CODE DESC	System generated Federal classification. This description of the classification code is generated from the Air Program Pollutant values to reflect the highest emission level classification of criteria pollutants regulated by an air program. This value is generated from Federal values. Valid Values are: A=Major, SM=Synthetic Minor, B=Minor, C=Unknown.	ELD1	A	25.0			N
EPA COMPLIANCE STATUS	A system generated Federal bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from the Federal value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	ECS1	A	1.0			N
EPA COMPLIANCE STATUS DESC	A system generated description of the Federal bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from the Federal value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	EDS1	A	25.0			N
EPA PLANT IDENTIFICATION NUMBER	A 12-digit number assigned by the Federal Registry System, used by all EPA systems to identify a plant.	PEPA	A/N	12.0	Input by EPA staff only. Special User Profile code R is required. Batch changes are completed by the AFS National Contractors.	Facility	N
FACILITY CAPACITY	OBSOLETE	FCAP	N	7.0			OBSOLETE
FACILITY CAPACITY UNITS	OBSOLETE	FCPU	A	15.0			OBSOLETE

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
GOVERNMENTAL FACILITY CODE	**A mandatory field identifying facilities owned or operated by a governmental unit. Valid values are: 0=All other facilities not owned or operated by a Federal, state, or local government; 1=Source owned or operated by the Federal Government; 2=Source owned or operated by the State; 3=Source owned or operated by the County; 4=Source owned or operated by the Municipality; 5=Source owned or operated by the District.**	**GOVT**	**A**	**1.0**			**Y**
GOVT FACILITY CODE DESC	A system generated description of the Governmental Facility Code identifying facilities owned or operated by a governmental unit. Valid values are: 0=All other facilities not owned or operated by a Federal, state, or local government; 1=Source owned or operated by the Federal Government; 2=Source owned or operated by the State; 3=Source owned or operated by the County; 4=Source owned or operated by the Municipality; 5=Source owned or operated by the District.	GOVD	A	25.0			N
INSPECTOR	Optional code to identify a staff member who performed a plant inspection. This code must be a valid value on the Staff Table.	INSR	A	3.0	A valid staff code must be on record in the Staff Table. Access to the Staff Table is limited by special authority on the user profile form.		N
INSPECTOR NAME	System generated optional value, the name of the staff member who performed a plant inspection. This name is generated from a code value on the Staff Table.	INNM	A	15.0	A valid staff code must be on record in the Staff Table. Access to the Staff Table is limited by special authority on the user profile form. It is recommended that inspector names be entered with the last name first, followed by a comma and then first initial or first name, as space allows.		N
INSPECTOR TITLE	Optional code to identify the title of a staff member who performed a plant inspection. The staff code must be a valid value on the Staff Table.	INTT	A	15.0	A valid staff code must be on record in the Staff Table. Access to the Staff Table is limited by special authority on the user profile form. As the Staff Table is a Region-specific table, it is recommended that inspector titles start with the appropriate agency abbreviation for distinction.		N
LATITUDE COORDINATE	OBSOLETE	LAT1	N	6.0			OBSOLETE
LOCAL CONTROL REGION		LCON	A	2.0			
LONGITUDE COORDINATE	OBSOLETE	LON1	N	7.0			OBSOLETE
MACT CATEGORY	OBSOLETE	MACC	A	4.0			OBSOLETE
MACT CATEGORY DESC	OBSOLETE	MCCD	A	60.0			OBSOLETE
MACT IDENTIFIER	OBSOLETE	MACI	A	8.0			OBSOLETE
NAICS CODE	**A mandatory code identifying the value of the North American Industrial Classification System (NAICS). Either a NAICS or SIC code is mandatory.**	**NIC1**	**A**	**6.0**	**Either a SIC or NAICS code is mandatory in AFS to establish a plant.**		**Y**
NAICS CODE & EQUIVALENT SICs	System generated value for ad hoc reporting. Use of this acroynm will produce equivalent SIC codes in a retrieval.	NICS	A	6.0			N

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
NAICS CODE DESCRIPTION	System generated value of the North American Industrial Classification System. Either a NAICS or SIC code is mandatory.	NCD1	A	75.0	Either a SIC or NAICS code is mandatory in AFS to establish a plant.		N
NEDS PLANT ID	OBSOLETE	PNED	A	4.0	Most agencies use the PCDS number with one less digit for the NEDS ID.		OBSOLETE
NUMBER OF EMPLOYEES	OBSOLETE	NMEP	N	5.0			OBSOLETE
OPERATING STATUS	A one-digit mandatory code identifying the operation condition of a plant. This value is bubbled-up from the plant air program records of AFS and is the most significant operative value of the plant operating status. Valid values are: O=Operating, L=Landfill, R=NESHAP Renovation, D=NESHAP Demolition, S=NESHAP Spraying, I=Seasonal, T=Temporarily Closed, C=Under Construction, P=Planned Facility, X=Permanently Closed. The order of most significant to least (for bubble up purposes): O, L, R, D, S, I, T, C, P, X.	OPST	A	1.0	This field does not have state and Federal values. Operating Status O, T, and I are used in National RECAP Retrievals. Operating Statuses L, R, D, and S are considered obsolete. Sources Permanently closed for three years or more should be archived.		N
OPERATING STATUS DESCRIPTION	A system generated bubble-up value of the most significant operative value of the plant operating status. Reference the air program operating status.	OPSD	A	25.0	This field does not have state and Federal values.		N
PERSON UPDATING RECORD	A system generated value of the User ID last updating the record.	PU11	A	8.0			N
PLANT CITY	**The name of the city or town where the plant is located. If a City Code is entered for a plant, the city name will be generated for valid codes.**	**CYNM**	**A**	**30.0**	**Entry of either the City Code or City Name is mandatory. Reference the FIPS table in AFS Table File Lookup in the Utilities.**		**Y**
PLANT DESCRIPTION	An optional use field that allows the user to provide a short description of plant operations.	DSC1	A	25.0			N
PLANT NAME	**A mandatory field which is the name associated with a plant at a given location. The name should identify the owning corporation and site name, if applicable. For example, the Twin Oaks site of an Entergy plant would be named "Entergy Twin Oaks", not just "Twin Oaks", or "Entergy".**	**PNME**	**A**	**40.0**			**Y**
PLANT STREET ADDRESS	**The street address for the physical location of the plant.**	**STRT**	**A**	**30.0**	**PO Boxes are not allowed in this field.**		**Y**
PLANT UTM HORIZONTAL COORDINATE	OBSOLETE	UTH1	N	3.1			OBSOLETE
PLANT UTM VERTICAL COORDINATE	OBSOLETE	UTV1	N	4.1			OBSOLETE
PRIMARY INDUSTRIAL CLASS CODE	**A mandatory code identifying the primary Standard Industrial Code (SIC) classifying the main product produced or service performed at the plant. Reference the SIC table in the Utilities.**	**SIC1**	**A**	**4.0**	**Also see NAICS acroynms: NIC1, NICS, NCD1, SICN**		**Y**
PRIMARY SIC DESCRIPTION	System generated value of the primary SIC description.	SCD1	A	25.0			N
PRINCIPAL PRODUCT	OBSOLETE	PRPR	A	25.0			OBSOLETE
PRIORITY CODE	An optional field. A 1-digit code which is used to identify facilities falling into various compliance monitoring priority categories. See the Data Dictionary for valid values.	PRIC	A	1.0	Update access to this field is limited to National EPA personnel. This field is not currently up to date.		N
PRIORITY CODE DESCRIPTION	A system generated field describing the priority code. See the Data Dictionary for valid values.	PRCD	A	25.0	Update access to PRIC is limited to National EPA personnel. This field is not currently up to date.		N
PROPERTY AREA	OBSOLETE	PRAR	N	5.1			OBSOLETE

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
REGION CODE	A system generated value identifying the EPA region in which the plant is located. The code is generated from the State codes on the AFS FIPS table.	REGN	A	2.0			N
REGIONAL PLANNING AGENCY	An optional field. User-defined code identifying any Regional Planning Agency maintaining jurisdiction over the plant.	RPLA	A	2.0			N
SAROAD STATE CODE	OBSOLETE	SSTT	A	2.0			OBSOLETE
SECONDARY INDUSTRIAL CLASS CODE	An optional code identifying the secondary Standard Industrial Code (SIC) classifying the second most prominent product produced or service performed at the plant.	SIC2	A	4.0	Also see NAICS acroynms: NIC1, NICS, NCD1, SICN		N
SECONDARY SIC DESCRIPTION	System generated value of the secondary SIC description.	SCD2	A	25.0			N
SECTION 112 INDICATOR	OBSOLETE	S112	A	1.0 50			OBSOLETE
SECTION 112 INDICATOR DESC	OBSOLETE	S12D	A	60.0			OBSOLETE
SIC CODE & EQUIVALENT NAICs	A system generated value for ad hoc retrieval use. Use of this acronym in a retrieval specifies an SIC code and will retrieve all equivalent NAICS codes.	SICN	A	4.0	For ad hoc use.		N
SIGNIFICANT VIOLATOR FLAG 1	OBSOLETE	SVI1	A	1.0			OBSOLETE
SIGNIFICANT VIOLATOR FLAG 2	OBSOLETE	SVI2	A	1.0			OBSOLETE
SIGNIFICANT VIOLATOR FLAG 3	OBSOLETE	SVI3	A	1.0			OBSOLETE
SIGNIFICANT VIOLATOR FLAG 4	OBSOLETE	SVI4	A	1.0			OBSOLETE
SIP PROGRAM	OBSOLETE	SIPP	A	5.0			OBSOLETE
SOURCE MONITORING INFORMATION	OBSOLETE	SMON	A	1.0			OBSOLETE
STATE ABBREV	A two-digit alpha postal abbreviation identifying the state in which a plant is located. For valid values, see the Data Dictionary.	STAB	A	2.0			N
STATE CLASSIFICATION CODE	System generated default classification. This value is genera	SCL1	A	2.0			N
STATE CLASSIFICATION CODE DESC	System generated default classification. This description of the classification code generated from the Air Program Pollutant values to reflect the highest emission level classification of criteria pollutants regulated by an air program. This value is generated from State/Local agency values. Valid Values are: A=Major, SM=Synthetic Minor, B=Minor, C=Unknown.	SLD1	A	25.0			N
STATE CODE	**Mandatory code used to identify the state in which a plant is located.**	**STTE**	**A**	**2.0**			**Y**
STATE COMPLIANCE STATUS	A system generated State bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from the State value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	SCS1	A	1.0			N

DATA ELEMENT NAME	DATA ELEMENT DEFINITION	ACROYNM	TYPE	WIDTH	COMMENT	EPA DATA STANDARD	MDR?
STATE COMPLIANCE STATUS DESC	A system generated description of the State bubble-up value of the most serious compliance status of air program pollutants at a plant. The most serious case (worst to best) is bubbled-up from the State value. Compliance values fall within 4 categories: In Compliance, Out of Compliance, On Schedule, and Unknown Compliance. Sources with unaddressed High Priority Violations should be listed as Out of Compliance. Title V Annual Compliance Certifications with deviations may or may not be listed as Out of Compliance. See Air Program pollutants for individual values. See the Data Dictionary for all valid values.	SDS1	A	25.0			N
STATE COUNTY EMISSIONS SOURCE	OBSOLETE	SCSE	A	9.0			OBSOLETE
STATE EMISSIONS DATA ELEMENT 1	OBSOLETE	SD01	A	3.0			OBSOLETE
STATE EMISSIONS DATA ELEMENT 9	OBSOLETE	SD09	A	30.0			OBSOLETE
STATE NAME	System generated field which identifies the state which a plant is located within.	STNM	A	20.0	Spells out a state name.		N
STATE PRIVATE INDICATOR	An optional field available only to authorized state users indicating whether informaiton contained on a record is not federally reportable and designated state private. Valid values are Y=Yes, N=No. Y on SP11 indicates that the entire plant is State Private.	SP11	A	1.0	Update access limited to authorized state users.		N
STATE REGISTRATION NUMBER	Optional value, a state assigned identifier used to identify a plant. Usually a value from a state system.	STRS	A	15.0	Although optional, it is recommended that this value be populated in AFS if there is a corresponding state/local value.		N
STATE-COUNTY-SOURCE ID	Optional use field in retrievals. A 10-digit character field identifying a facility through the concatenation of the FIPS State, FIPS County, and PCDS source ID number.	SCSC	A	10.0	Commonly known as the AFS ID number, not to be confused with the AFS Permit ID number, PAFS. Key number for Envirofacts sources.		N
STATUS AREA	OBSOLETE	STAT	A	5.0			OBSOLETE
SUB CATEGORY	OBSOLETE	MACS	A	4.0			OBSOLETE
SUB CATEGORY DESC	OBSOLETE	MCSD	A	60.0			OBSOLETE
TELEPHONE AREA CODE COMPLIANCE	Optional use field. Telephone area code of a compliance program contact.	TLAC	A	3.0			N
TELEPHONE AREA CODE EMISSIONS	OBSOLETE	TLAE	A	3.0			OBSOLETE
TELEPHONE NUMBER COMPLIANCE	Optional use field. Telephone number of a compliance program contact.	TLNC	A	7.0			N
TELEPHONE NUMBER EMISSIONS	OBSOLETE	TLNE	A	7.0			OBSOLETE
TERTIARY INDUSTRIAL CLASS CODE	An optional code identifying the tertiary Standard Industrial Code (SIC) classifying the third most prominent product produced or service performed at the plant.	SIC3	A	4.0	Also see NAICS acroynms: NIC1, NICS, NCD1, SICN		N
TERTIARY SIC DESCRIPTION	Sysem generated value of the tertiary SIC description.	SCD3	A	25.0			N
USER PLANT ID	OBSOLETE	UDPL	A	12.0			OBSOLETE
UTM ZONE	OBSOLETE	UTZ1	N	2.0			OBSOLETE
YEAR OF EMISSIONS INVENTORY	OBSOLETE	YINV	A	2.0			OBSOLETE
ZIP CODE	**Mandatory field, the zip code for the plant address.**	**ZIPC**	**A**	**9.0**	**Reported in conjunction with the Plant Street Address and City.**		**Y**

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Appendix 3a

AFS Regional Action Types

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SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 01

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	AA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	AK-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	FE-R		EPA CONDUCTED FCE/ON-SITE	
FZ-N	FZ-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE/OFF-SITE	
FS-N		FS-R	STATE CONDUCTED FCE/ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	AE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	AQ-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	EC-R		EPA INVESTIGATION CONDUCTED	
EI-N *	EI-R		EPA INVESTIGATION STARTED	
SC-N		SC-R	STATE INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	AM-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	AR-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	EP-R		EPA ON-SITE INSP. PIECE OF AN FCE	
ES-N	ES-R		EPA CONDUCTED PCE/ON-SITE	
ES-N	J5-R		VISIBLE EMISSIONS EVALUATION (RM9) BY EPA	
ES-N	M6-R		EPA CMS QA OBSERVATION (60.13)	
ES-N	M8-R		EPA CMS AUDIT CONDUCTED	
ES-N	R7-R		EPA COMPLAINT INSPECTION	
EX-N	EX-R		EPA CONDUCTED PEC/OFF-SITE	
EX-N	X9-R		CAA SECTION 114 LETTER RESPONSE REVIEWED BY EPA	
EX-N	XM-R		MACT (PART 63) REPORT REVIEWED BY EPA	
EX-N	XN-R		NSPS (PART 60) REPORT REVIEWED BY EPA	
EX-N	XO-R		OTHER (NON-NSPS, NON-MACT) REPORT REVIEWED BY EPA	
PS-N		14-R	STATE PARTIAL INSPECTION	
PS-N		15-R	STATE VISIT FOR PERMITTING	
PS-N		17-R	STATE COMPLAINT INSPECTION	
PS-N		36-R	SAMPLE TAKEN	
PS-N		A9-R	SOURCE REGISTRATION VERIFIED BY INSPECTION	
PS-N		J7-R	VISIBLE EMISSION EVALUATION (RM9) BY STATE	
PS-N		M2-R	STATE CMS AUDIT CONDUCTED	
PS-N		M5-R	STATE CMS QA OBSEERVATION (60.13)	
PS-N		PS-R	STATE PCE/ON-SITE	
PS-N		SP-R	STATE ON-SITE INSP. PIECE OF AN FCE	
PS-N		U9-R	STATE MULTIMEDIA INSPECTION - LEVEL 2 OR GREATER	
PX-N		39-R	REPORT TO STATE	
PX-N		A8-R	SOURCE REGISTRATION RECEIVED	
PX-N		E4-R	EMISSION TEST RESULTS REVIEWED BY STATE	
PX-N		PX-R	STATE CONDUCTED PCE/OFF-SITE	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
SS-N	SS-R		EPA NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	M7-R		PERFORMANCE TEST EPA REQUIRED	Results code:Pass(PP) or Fail(FF).Action PLLT.
TT-N	TT-R		EPA RECEIPT OF STACK TEST REPORT	
3A-N		E2-R	EMISSION TEST STATE REQUIRED	Results Code:Pass(PP) or Fail(FF).
ST-N		SU-R	AGENCY NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TR-N		TR-R	STATE REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVD	Results code:Pass(PP) or Fail(FF).
TS-N		TS-R	STATE RECEIPT OF STACK TEST REPORT	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 01

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	BA-R		EPA NOTICE OF VIOLATION	
7C-N		28-R	STATMENT OF DEFICIENT PRACTICES	
7C-N		AB-R	STTE NOTICE OF VIOLATION	
7C-N		AN-R	STATE NOTICE OF NON-COMPLIANCE	
7C-N		L1-R	NOV ISSUED BY STATE	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	RA-R		EPA CONSENT DECREE	PAM1
7F-N	Y9-R		EPA ADMINISTRATIVE PENALTY ORDER 113(D)	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	AO-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AP-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	SA-R		EPA CONSENT AGREEMENT FINAL ORDER	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		56-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		Z7-R	STATE ADMIN FINE BY CONSENT AGREEMENT SIGNED	PAM1(Total Assessed)
8C-N		Z8-R	STTE NOTICE PROP FINE&HEARING, PAID W/O SIGNED AFC	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	99-R		CIVIL ACTION REFERRED TO EPA HEADQUARTERS	PAM1
4B-N *	DA-R		EPA CIVIL ACTION (REFERRAL)	PAM1
AI-N *	AI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	AJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1E-N *		G1-R	REFER TO STATE ATTORNEY GENERAL	PAM1
3D-N *		Z4-R	STATE CIVIL PENALTY	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation				
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	J1-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	V3-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		W1-R	STATE DAY ZERO	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 01

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
2M-N	V7-R		PROP SIP OR FIP REVISION WILL LEAD TO COMPLIANCE	
6B-N	RA-R		EPA CONSENT DECREE	PAM1
7F-N	Y9-R		EPA ADMINISTRATIVE PENALTY ORDER 113(D)	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	AO-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		56-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		Z7-R	STATE ADMIN FINE BY CONSENT AGREEMENT SIGNED	PAM1(Total Assessed)
8C-N		Z8-R	STTE NOTICE PROP FINE&HEARING, PAID W/O SIGNED AFC	PAM1(Total Assessed)
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	DC-R	DC-R	CLOSEOUT MEMO ISSUED	
VR-N	VA-R	VA-R	VIOLATION RESOLVEDD	
7G-N	V6-R		SOUR RET TO COMPL BY US EPA W/ NO FURTHER ACT REQ	
AH-N	AP-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2K-N		V5-R	SOUR RET TO COMPL BY STATE W/ NO FURTHER ACT REQ	
C7-N		DC-R	CLOSEOUT MEMO ISSUED	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		COMPLIANCE CERTIFICATION EPA REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown. RDE8=Deviation,Y-Yes or N-No.
CB-N	CB-R		TITLE V COMPLIANCE CERT. DUE/RCVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	NM-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 01

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 02

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	AA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	AB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	FE-R		EPA CONDUCTED FCE/ON-SITE	
FZ-N	F1-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE/OFF-SITE	
FS-N		FS-R	STATE CONDUCTED FCE/ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	AL-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	AF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	CE-R		EPA INVESTIGATION CONDUCTED	
EI-N *	IE-R		EPA INVESTIGATION STARTED	
SC-N		CS-R	STATE INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	AK-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	AD-R		FEDERAL AIR TOXICS OFFSITE PCE	
EE-N	EE-R		COMPLAINT ON-SITE PCE (EPA)	
EM-N	EM-R		PROCESS OFF-SITE PCE (EPA)	
EO-N	EO-R		ON-SITE PCE OBSERVATION (EPA)	
EP-N	EP-R		PERMIT ON-SITE PCE (EPA)	
ES-N	50-R		EPA SOURCE INSPECTION - LEVEL 2 OR GREATER	
ES-N	53-R		EPA SOURCE TEST	
ES-N	58-R		EPA PRIMACY INSPECTION - LEVEL 2 OR GREATER	
ES-N	ES-R		EPA PCE/ON-SITE	
ES-N	L4-R		EPA CASE DEVELOPMENT INSPECTION - LEVEL 2 OR GRTR	
ES-N	MM-R		MULTIMEDIA INSPECTION (EPA) - LEVEL 2 OR GREATER	
EX-N	E2-R		EER REVIEWED BY EPA	
EX-N	EX-R		EPA PCE/OFF-SITE	
PC-N		PC-R	COMPLAINT ON-SITE PCE (STATE)	
PO-N		PO-R	ON-SITE PCE OBSERVATION (STATE)	
PP-N		PP-R	PERMIT ON-SITE PCE (STATE)	
PR-N		PR-R	PROCESS OFF-SITE PCE (STATE)	
PS-N		IC-R	COMPLAINT INSPECTION BY STATE	
PS-N		PS-R	STATE PCE/ON-SITE	
PS-N		S8-R	INSPECTION BY STATE - LEVEL 2 OR GREATER	
PS-N		S9-R	STATE SOURCE TEST	
PS-N		SS-R	SAMPLE COLLECTED BY STATE	
PX-N		PX-R	STATE CONDUCTED PCE/OFFSITE	
PX-N		TP-R	PERIODIC REPORT	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	2A-R		EPA CONDUCTED STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
SS-N	SN-R		EPA NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	TO-R		EPA REQ (O/O COND) STACK TEST/OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
TT-N	TT-R		EPA RECEIPT OF STACK TEST REPORT	
3A-N		3A-R	STATE REQ (O/O COND) STACK TEST/OBSV & REVIEWED	Results Code:Pass(PP) or Fail(FF).
6C-N		6S-R	STATE CONDUCTED STACK TEST	Results Code:Pass(PP) or Fail(FF).
ST-N		ST-R	AGENCY NON-MDR STACK TEST	Results Code:Pass(PP) or Fail(FF).
TR-N		TR-R	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).
TS-N		SV-R	STATE RECEIPT OF STACK TEST REPORT	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING:REGION 02

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	55-R		EPA NOTICE OF VIOLATION	
6A-N	6A-R		EPA NOV ISSUED	
7A-N	7A-R		EPA NOTICE OF NONCOMPLIANCE (SECTION120) ISSUED	
7C-N		L1-R	NOV ISSUED BY STATE	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	6B-R		EPA CONSENT DECREE	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7E-N	7E-R		EPA SECTION 167 ORDER ISSUED	PAM1
7E-N	P1-R		167 STOP CONSTRUCTION ORDER	PAM1
7F-N	7F-R		113D APO COMPLAINT FILED	PAM1
8A-N	56-R		EPA ABATEMENT ORDER ISSUED	PAM1
8A-N	8A-R		113A ORDER ISSUED	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	AM-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	C2-R		113(D) APO RECALCULATED	PAM1
C3-N	C3-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		2D-R	STATE CONSENT DECREE	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		4L-R	NOTICE OF HEARING SENT TO SOURCE OWNER	PAM1(Total Assessed)
8C-N		8C-R	STATE ADMINISTRATIVE ORDER	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	4B-R		EPA CIVIL ACTION (REFERRAL)	PAM1
4B-N *	57-R		EPA CIVIL ACTION (REFERRAL)	PAM1
4B-N *	64-R		REFERRED TO DEPARTMENT OF JUSTICE BY EPA	PAM1
5B-N *	5B-R		EPA CRIMINAL ACTION	PAM1
5B-N *	L7-R		EPA CRIMINAL ACTION	PAM1
7B-N *	Z6-R		FEDERAL CIVIL PENALTY	PAM1
AI-N *	AI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	AJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1D-N *		1D-R	CRIMINAL REFERRAL	
1D-N *		L3-R	STATE CRIMINAL ACTION	
1E-N *		1E-R	CIVIL REFERRAL TO STATE AG	PAM1
1E-N *		S6-R	REFER TO STATE ATTORNEY GENERAL	PAM1
3D-N *		Z4-R	STATE CIVIL PENALTY	PAM1
9C-N		9C-R	STATE CIVIL ACTION	PAM1
9C-N		AG-R	REFER TO NEW YORK STATE ATTORNEY GENERAL	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 02

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	FZ-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	DY-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		SZ-R	STATE DAY ZERO	PLC1, Lead Agency

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	2M-R	2M-R	PROP SIP/FIP REVISION WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	6B-R		EPA CONSENT DECREE	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7A-N	7A-R		EPA NOTICE OF NONCOMPLIANCE (SECTION120) ISSUED	
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7E-N	7E-R		EPA SECTION 167 ORDER ISSUED	
7E-N	P1-R		167 STOP CONSTRUCTION ORDER	
7F-N	7F-R		113D APO COMPLAINT FILED	PAM1
8A-N	56-R		EPA ABATEMENT ORDER ISSUED	PAM1
8A-N	8A-R		113A ORDER ISSUED	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	AM-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		2D-R	STATE CONSENT DECREE	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		4L-R	NOTICE OF HEARING SENT TO SOURCE OWNER	PAM1(Total Assessed)
8C-N		8C-R	STATE ADMINISTRATIVE ORDER	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
9C-N		9C-R	STATE CIVIL ACTION	PAM1
9C-N		AG-R	REFER TO NEW YORK STATE ATTORNEY GENERAL	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	C7-R	C7-R	CLOSEOUT MEMO ISSUED	
VR-N	VR-R	VR-R	VIOLATION RESOLVED	
WD-N	WD-R	WD-R	WITHDRAWN	
7G-N	7G-R		SOUR RET TO COMPL BY US EPA W/NO FURTHER ACT REQ	
C3-N	C3-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	
2K-N		2K-R	SOUR RET TO COMPL BY STTE W/NO FURTHER ACT REQ	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V COMPLIANCE CERT. DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		TITLE V COMPLIANCE CERTIFICATION REVIEW BY EPA	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown. RDE8=Deviation, Y-Yes or N-No.
CB-N	CB-R		TV ANNUAL COMPL. CERT DUE/RECV BY PERM. AUTHORITY	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	COMPLIANCE CERTIFICATION REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	NA-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N		NN-R	EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 02

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 03

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	AA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	AB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	10-R		EPA CONDUCTED FCE/ON-SITE	
FE-N	FE-R		EPA CONDUCTED FCE/ON-SITE	
FZ-N	11-R		EPA CONDUCTED FCE/OFF-SITE	
FZ-N	FZ-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE/ OFF-SITE	
FS-N		08-R	STATE CONDUCTED FCE/ON-SITE	
FS-N		81-R	STATE INSPECTION STAGE 1 VAPOR RECOVERY	
FS-N		82-R	STATE INSPECTION STAGE 2 VAPOR RECOVERY	
FS-N		FS-R	STATE CONDUCTED FCE/ON-SITE	
FS-N		PO-R	P/O INSPECTION	
FS-N		SI-R	STATE MULTIMEDIA INSPECTION	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	AE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	AF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	3R-R		EPA INVESTIGATION COMPLETED	
EI-N *	RI-R		REGION III INVESTIGATION	
SC-N		IC-R	STATE INVESTIGATION COMPLETED	
SI-N *		IS-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	A1-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	A2-R		FEDERAL AIR TOXICS OFFSITE PCE	
EE-N	EE-R		COMPLAINT ON-SITE PCE (EPA)	
EM-N	EM-R		PROCESS OFF-SITE PCE (EPA)	
EO-N	EO-R		ON-SITE PCE OBSERVATION (EPA)	
EP-N	EN-R		PERMIT ON-SITE PCE (EPA)	
ES-N	ES-R		EPA CONDUCTED PCE/ ON-SITE	
EX-N	EP-R		EPA CONDUCTED PCE/ OFF-SITE	
PC-N		PD-R	COMPLAINT ON-SITE PCE (STATE)	
PO-N		PT-R	ON-SITE PCE OBSERVATION (STATE)	
PP-N		PP-R	PERMIT ON-SITE PCE (STATE)	
PR-N		PQ-R	PROCESS OFF-SITE PCE (STATE)	
PS-N		PS-R	STATE CONDUCTED PCE/ ON-SITE	
PX-N		74-R	EXCESS EMISSION REPORT REVIEWED	
PX-N		PX-R	STATE CONDUCTED PCE/ OFF-SITE	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	12-R		EPA STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
SS-N	SS-R		EPA NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	14-R		EPA STACK TEST REVIEW - LEVEL 2 OR GREATER	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	13-R		EPA OBSERVED STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TT-N	TT-R		EPA RECEIPT OF STACK TEST REPORT	
3A-N		18-R	STATE OBSERVED STACK TEST	Results Code:Pass(PP) or Fail(FF).
3A-N		73-R	NEW SOURCE PERFORMANCE TEST	Results Code:Pass(PP) or Fail(FF).
6C-N		16-R	STATE STACK TEST	Results Code:Pass(PP) or Fail(FF).
ST-N		ST-R	AGENCY NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TR-N		15-R	SOURCE OPERATOR STACK TEST	Results code:Pass(PP) or Fail(FF).
TS-N		TS-R	STATE RECEIPT OF STACK TEST REPORT	

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	23-R		EPA NOV ISSUED	
7A-N	80-R		SECTION 120 NOTICE OF NONCOMPLIANCE	
7C-N		49-R	STATE NOTICE OF VIOLATION ISSUED	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 03

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	31-R		EPA COURT CONSENT DECREE ENTERED	PAM1
6B-N	32-R		FEDERAL COURT ORDER	PAM1
6B-N	MD-R		MULTIAMEDIA CONSENT DECREE	PAM1
7E-N	SC-R		SECTION 167 PSD STOP CONSTRUCTION ORDER	PAM1
7F-N	7F-R		113D APO COMPLAINT FILED.	PAM1
7F-N	MA-R		MULTIMEDIA ADMINISTRATIVE PENALTY ORDER	PAM1
8A-N	33-R		EPA 113(A) (1) 30-DAY SIP ORDER	PAM1
8A-N	34-R		EPA 113(A) (3) NON-SIP ORDER	PAM1
8A-N	35-R		EPA 113(A) (5) STOP CONSTRUCTION ORDER	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	AO-R		113(D) APO RECALCULATED	PAM1
C3-N	AC-R		ADMINISTRATIVE CIVIL PENALTY COLLECTED	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		45-R	STATE COURT ORDER ISSUED	PAM1(Total Assessed)
2D-N		46-R	STATE COURT CONSENT DECREE SIGNED	PAM1(Total Assessed)
8C-N		47-R	STATE ADMINISTRATIVE UNILATERAL ORDER	PAM1(Total Assessed)
8C-N		48-R	STATE ADMINISTRATIVE CONSENT AGREEMENT	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	27-R		REFERRAL TO DSSE	PAM1
4B-N *	28-R		REFER TO JUSTICE	PAM1
4B-N *	29-R		EPA CIVIL ACTION FILED (REFERRAL)	PAM1
4B-N *	MR-R		MULTIMEDIA REFERRAL	PAM1
5B-N *	30-R		EPA CRIMINAL ACTION FILED	PAM1
7B-N *	90-R		EPA CIVIL PENALTY ASSESSED	PAM1
AI-N *	AI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	AJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENT	PAM1
1D-N *		44-R	STATE CRIMINAL ACTION FILED	
1E-N *		CR-R	STATE CIVIL REFERRAL	PAM1
1E-N *		SM-R	STATE MULTIMEDIA CIVIL REFERRAL	PAM1
3D-N *		92-R	STATE CIVIL PENALTY ASSESSED	PAM1
9C-N		43-R	STATE CIVIL ACTION FILED	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation				
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	DZ-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	DY-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		2E-R	STATE DAY ZERO	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 03

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	2M-R	2M-R	PROP SIP OR FIP REVISION WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	31-R		EPA COURT CONSENT DECREE ENTERED	PAM1
6B-N	32-R		FEDERAL COURT ORDER	PAM1
6B-N	MD-R		MULTIAMEDIA CONSENT DECREE	PAM1
7A-N	80-R		SECTION 120 NOTICE OF NONCOMPLIANCE	
7E-N	SC-R		SECTION 167 PSD STOP CONSTRUCTION ORDER	
7F-N	7F-R		113D APO COMPLAINT FILED.	PAM1
7F-N	MA-R		MULTIMEDIA ADMINISTRATIVE PENALTY ORDER	PAM1
8A-N	33-R		EPA 113(A) (1) 30-DAY SIP ORDER	PAM1
8A-N	34-R		EPA 113(A) (3) NON-SIP ORDER	PAM1
8A-N	35-R		EPA 113(A) (5) STOP CONSTRUCTION ORDER	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		45-R	STATE COURT ORDER ISSUED	PAM1(Total Assessed)
2D-N		46-R	STATE COURT CONSENT DECREE SIGNED	PAM1(Total Assessed)
2L-N		07-R	SIP REVISION PENDING	
8C-N		47-R	STATE ADMINISTRATIVE UNILATERAL ORDER	PAM1(Total Assessed)
8C-N		48-R	STATE ADMINISTRATIVE CONSENT AGREEMENT	PAM1(Total Assessed)
9C-N		43-R	STATE CIVIL ACTION FILED	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	CO-R	CO-R	CASE CLOSE-OUT	
VR-N	VR-R	VR-R	VIOLATION RESOLVED	
WD-N	WD-R	WD-R	WITHDRAWN	
7G-N	7G-R		SOURCE RET TO COMPL BY EPA W/NO FURTHER ACT REQ	
C3-N	AC-R		ADMINISTRATIVE CIVIL PENALTY COLLECTED	
2K-N		2K-R	SOURCE RET TO COMPL BY STATE W/NO FURTHER ACT REQ	
2K-N		2L-R	HPV ADDRESSED/RESOLVED BY STATE UNDEFINED ACTION	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	COMPLIANCE CERTIFICATIONS DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		REVIEWED FOR DEVIATION	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown. RDE8=Deviation, Y-Yes and N-No.
CB-N	CB-R		TITLE V COMPLIANCE CERT DUE/RECEIVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SN-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	NA-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 03

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 04

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	XA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	XB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	FE-R		EPA CONDUCTED FCE/ ON-SITE	
FZ-N	FZ-R		EPA CONDUCTED FCE/ OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE/ OFF-SITE	
FS-N		FS-R	STATE CONDUCTED FCE/ ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	XE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	XF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	EC-R		EPA INVESTIGATION CONDUCTED	
EI-N *	E0-R		EPA INVESTIGATION STARTED	
SC-N		SC-R	STATE INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	XC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	XD-R		FEDERAL AIR TOXICS OFFSITE PCE	
EE-N	EE-R		COMPLAINT ON-SITE PCE (EPA)	
EM-N	EM-R		PROCESS OFF-SITE PCE (EPA)	
EO-N	EO-R		ON-SITE PCE OBSERVATION (EPA)	
EP-N	EP-R		PERMIT ON-SITE PCE (EPA)	
ES-N	ES-R		EPA CONDUCTED PCE/ ON-SITE	
EX-N	EX-R		EPA CONDUCTED PCE/ OFF-SITE	
PC-N		PC-R	COMPLAINT ON-SITE PCE (STATE)	
PO-N		PO-R	ON-SITE PCE OBSERVATION (STATE)	
PP-N		PP-R	PERMIT ON-SITE PCE (STATE)	
PR-N		PR-R	PROCESS OFF-SITE PCE (STATE)	
PS-N		27-R	STATE COMPLIANCE INSPECTION - LEVEL 2 OR GREATER	
PS-N		54-R	STATE REINSPECTION - LEVEL 2 OR GREATER	
PS-N		PS-R	STATE CONDUCTED PCE/ ON-SITE	
PX-N		PX-R	STATE CONDUCTED PCE/ OFF-SITE	
PX-N		SD-R	SELF DISCLOSED VIOLATION	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	BA-R		EPA CONDUCTED STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	TO-R		EPA REQ (O/O COND) STACK TEST/ OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
3A-N		23-R	STATE REQ (O/O COND) STACK TEST/OBSVD & REVIEWED	Results Code:Pass(PP) or Fail(FF).
3A-N		7A-R	NSPS PERFORMANCE TEST	Results Code:Pass(PP) or Fail(FF).
3A-N		B7-R	SOURCE TEST OBSERVED	Results Code:Pass(PP) or Fail(FF).
3A-N		V4-R	NESHAPS SOURCE TEST	Results Code:Pass(PP) or Fail(FF).
6C-N		24-R	STATE CONDUCTED STACK TEST	Results Code:Pass(PP) or Fail(FF).
6C-N		59-R	STATE EVALUATED SOURCE TEST REPORT	Results Code:Pass(PP) or Fail(FF).
TR-N		TR-R	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).
TS-N		TS-R	STATE RECEIPT OF STACK TEST REPORT	

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	A8-R		NOTICE OF VIOLATION	
6A-N	J9-R		EPA PSD NOTICE OF VIOLATION	
6A-N	L5-R		NOV ISSUED BY EPA	
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7A-N		74-R	STATE WARNING LETTER SENT	
7C-N		56-R	STATE NOTICE OF VIOLATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 04

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	CB-R		FEDERAL CONSENT AGREEMENT SIGNED	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7E-N	K8-R		EPA 167 ORDER ISSUED	PAM1
7F-N	AB-R		113(D) ADMINISTRATIVE COMPLIANT FILED	PAM1
7F-N	AU-R		113(D) APO COMPLAINT FILED	PAM1
8A-N	B1-R		EPA 113(A) ADMINISTRATIVE ORDER ISSUED	PAM1
8A-N	K1-R		EPA PSD ORDER	PAM1
8A-N	P9-R		EPA NSR ORDER	PAM1
8A-N	V7-R		NESHAPS ORDER BY EPA	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y3-R		EPA 113A PROHIBIT CONSTRUCTION ORDER ISSUED	PAM1
AG-N	XG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	XH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C3-N	AH-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Administrative Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		31-R	CONSENT ORDER ISSUED	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		40-R	STATE CONSENT ORDER	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	5B-R		EPA NSPS CIVIL ACTION (REFERRAL)	PAM1
4B-N *	B6-R		REFERRAL TO DOJ	PAM1
4B-N *	C1-R		EPA CIVIL ACTION (REFERRAL)	PAM1
4B-N *	K2-R		EPA PSD CIVIL ACTION (REFERRAL)	PAM1
4B-N *	L6-R		EPA NSR/PSD CIVIL ACTION (REFERRAL)	PAM1
4B-N *	V8-R		EPA NESHAPS CIVIL ACTION (REFERRAL)	PAM1
5B-N *	CA-R		EPA CRIMINAL ACTION	PAM1
7B-N *	Z6-R		EPA CIVIL PENALTY ASSESSED	PAM1
AI-N *	XI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	XJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1D-N *		63-R	STATE CRIMINAL SUIT FILED BY ATTORNEY GENERAL	PAM1
1D-N *		L3-R	STATE CRIMINAL ACTION	PAM1
1E-N *		60-R	STATE REFERRAL TO ATTORNEY GENERAL	PAM1
3D-N *		Z4-R	STATE CIVIL PENALTY ASSESSED	PAM1
9C-N		64-R	STATE CIVIL SUIT FILED BY ATTORNEY GENERAL	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation				
2B-N	06-R	06-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	07-R	07-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	01-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	A0-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		04-R	STATE DAY ZERO	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 04

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	AX-R	AX-R	PROPOSED SIP OR FIP REV WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	CB-R		FEDERAL CONSENT AGREEMENT SIGNED	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7A-N	D5-R		NOTICE (OF NON COMPLIANCE)	
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7E-N	K8-R		EPA 167 ORDER ISSUED	
7F-N	AB-R		113(D) ADMINISTRATIVE COMPLIANT FILED	PAM1
7F-N	AU-R		113(D) APO COMPLAINT FILED	PAM1
8A-N	4B-R		NSPS ORDER BY EPA	PAM1
8A-N	B1-R		EPA 113(A) ADMINISTRATIVE ORDER ISSUED	PAM1
8A-N	K1-R		EPA PSD ORDER	PAM1
8A-N	P9-R		EPA NSR ORDER	PAM1
8A-N	V7-R		NESHAPS ORDER BY EPA	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y3-R		EPA 113A PROHIBIT CONSTRUCTION ORDER ISSUED	PAM1
AG-N	XG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	XH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		31-R	CONSENT ORDER ISSUED	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
2L-N		AV-R	PROPOSED SIP REVISION WILL LEAD TO COMPLIANCE	
8C-N		40-R	STATE CONSENT ORDER	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
9C-N		64-R	STATE CIVIL SUIT FILED BY ATTORNEY GENERAL	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	AQ-R	AQ-R	CLOSEOUT MEMO ISSUED	
VR-N	AS-R	AS-R	VIOLATION RESOLVED	
VR-N	AZ-R	AZ-R	HPV RESOLVED - SOURCE RETURNED TO COMPLIANCE	
WD-N	AK-R	AK-R	WITHDRAWN	
7G-N	AT-R		SOURCE RET.TO COMPL.BY EPA WITH NO FURT ACTION REQ	
C3-N	AH-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	
2K-N		AW-R	SOURCE RET.TO COMP.BY STATE WITH NO FURTHER ACT RE	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V COMPLIANCE CERTIFICATION DUE RECVD BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		TITLE V COMPLIANCE CERTIFICATION REVIEW BY EPA	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	CS-R		TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	NA-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 04

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 05

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	AA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	AB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	L6-R		EPA CONDUCTED FCE/ON-SITE	
FZ-N	L7-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		82-R	STATE CONDUCTED FCE/OFF-SITE	
FS-N		81-R	STATE CONDUCTED FCE/ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	AE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	AF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	54-R		EPA INVESTIGATION CONDUCTED	
EI-N *	53-R		EPA INVESTIGATION STARTED	
SC-N		42-R	STATE INVESTIGATION CONDUCTED	
SI-N *		41-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	AC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	AD-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	L8-R		EPA PCE/ON-SITE	
EX-N	55-R		114 REPLY REVIEWED	
EX-N	L2-R		EPA OFF-SITE FILE REVIEW	
EX-N	L5-R		EPA PCE/OFF-SITE	
EX-N	RM-R		REPORTABLE MILESTONE REVIEWED	
PS-N		83-R	STATE PCE/ON-SITE	
PX-N		80-R	STATE PCE/OFF-SITE	
PX-N		FR-R	FESOP COMPLIANCE CERT REVIEW BY STATE LOCAL	
PX-N		RF-R	STATE OFF-SITE FILE REVIEW	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	18-R		EPA CONDUCTED STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
SS-N	SS-R		EPA NON-MDR STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	17-R		EPA REQ(O/O COND) STACK TEST/NOT OBSVD BUT REVWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	16-R		EPA REQ(O/O COND) STACK TEST/OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
3A-N		15-R	PERFORMANCE TEST	Results Code:Pass(PP) or Fail(FF).
3A-N		37-R	SOURCE TEST OBSERVED	Results Code:Pass(PP) or Fail(FF).
6C-N		36-R	SOURCE TEST CONDUCTED	Results Code:Pass(PP) or Fail(FF).
ST-N		ST-R	AGENCY NON-MDR STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TR-N		35-R	STATE REQ(O/O COND) STACK TEST/NOT OBSVD BUT REVWD	Results code:Pass(PP) or Fail(FF).

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	63-R		NOTICE OF VIOLATION ISSUED	
6A-N	A1-R		FINDING OF VIOLATION ISSUED	
6A-N	SC-R		EPA SHOW CAUSE LETTER	
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7C-N		D4-R	STATE WARNING LETTER	
7C-N		D5-R	LOCAL WARNING LETTER ISSUED	
7C-N		L1-R	NOV ISSUED BY STATE	

*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 05

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	D1-R		FEDERAL COURT ORDER ISSUED	PAM1
6B-N	K8-R		DECREE ENTERED	PAM1
7E-N	L3-R		167 STOP CONSTRUCTION ORDER	PAM1
7F-N	U1-R		113(D) ADMINISTRATIVE CIVIL COMPLAINT FILED	PAM1
8A-N	98-R		EPA 113(A)ORDER ISSUED	PAM1
8A-N	E1-R		EPA 113(A)(5)STOP CONSTRUCTION ORDER ISSUED	PAM1
8A-N	E7-R		FEDERAL FACILITY COMPLIANCE AGREEMENT	PAM1
8A-N	E8-R		EPA UNILATERAL ADMINISTRATIVE ORDER	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	U2-R		113(D) APO RECALCULATED	PAM1
C3-N	ZB-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	PAM1
C6-N	85-R		CONSENT DECREE/COURT ORDER AMENDMENT	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		06-R	STATE FORGIVABLE APO ISSUED	PAM1(Total Assessed)
8C-N		07-R	STATE NONFORGIVABLE APO ISSUED	PAM1(Total Assessed)
8C-N		08-R	STATE COMBINED (F/NF) APO ISSUED	PAM1(Total Assessed)
8C-N		66-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		68-R	LOCAL FINDINGS AND ORDERS ISSUED	PAM1(Total Assessed)
8C-N		E9-R	STATE UNILATERAL ADMINISTRATIVE ORDER	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	26-R		REFERRAL TO DSSE(CIVIL)	PAM1
4B-N *	27-R		REF DOJ	PAM1
5B-N *	69-R		EPA CRIMINAL ACTION	PAM1
7B-N *	Z6-R		FEDERAL CIVIL PENALTY	PAM1
AI-N *	AI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
1D-N *		XA-R	STATE REFERRAL (CRIMINAL)	PAM1
1E-N *		X3-R	STATE REFERRAL (CIVIL)	PAM1
3D-N *		Z4-R	STATE CIVIL PENALTY	PAM1
9C-N		X1-R	FILE BY STATE AG	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation				
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	23-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	DY-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
RT-N	RT-R	RT-R	SV REPORT AS ADDRESSED	
VL-N	VL-R	VL-R	SV REPORT AS ADDED	
2E-N		38-R	STATE DAY ZERO	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 05

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	G4-R	G4-R	PROPOSED PERMIT/SIP/FIP REV WILL LEAD TO COMPLIANC	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	D1-R		FEDERAL COURT ORDER ISSUED	PAM1
6B-N	K8-R		DECREE ENTERED	PAM1
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7E-N	L3-R		167 STOP CONSTRUCTION ORDER	
7F-N	U1-R		113(D) ADMINISTRATIVE CIVIL COMPLAINT FILED	PAM1
8A-N	98-R		EPA 113(A)ORDER ISSUED	PAM1
8A-N	E1-R		EPA 113(A)(5)STOP CONSTRUCTION ORDER ISSUED	PAM1
8A-N	E7-R		FEDERAL FACILITY COMPLIANCE AGREEMENT	PAM1
8A-N	E8-R		EPA UNILATERAL ADMINISTRATIVE ORDER	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
ED-N	ED-R		EPA DEMAND LETTER	
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		06-R	STATE FORGIVABLE APO ISSUED	PAM1(Total Assessed)
8C-N		07-R	STATE NONFORGIVABLE APO ISSUED	PAM1(Total Assessed)
8C-N		08-R	STATE COMBINED (F/NF) APO ISSUED	PAM1(Total Assessed)
8C-N		66-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		68-R	LOCAL FINDINGS AND ORDERS ISSUED	PAM1(Total Assessed)
8C-N		E9-R	STATE UNILATERAL ADMINISTRATIVE ORDER	PAM1(Total Assessed)
9C-N		X1-R	FILE BY STATE AG	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	K9-R	K9-R	CLOSEOUT MEMO ISSUED	
VR-N	44-R	44-R	VIOLATION RESOLVED	
WD-N	WD-R	WD-R	WITHDRAWN	
7G-N	A3-R		SOURCE RET TO COMPL BY USEPA W/ NO FURTHER ACT REQ	
C3-N	ZB-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	
2K-N		A4-R	SOURCE RETURNED TO COMPL BY THE STATE W/NO ACT RE	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		COMPLIANCE CERTIFICATION EPA REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown. RDE8=Deviation,Y-Yes or N-No.
CB-N	CB-R		TITLE V COMPLIANCE CERT DUE/RECEIVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AJ-N	AJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	
NA-N	M1-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

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SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 06

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	TF-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	TZ-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	EI-R		EPA CFC EXPORTER INSPECTION - LEVEL 2 OR GREATER	
FE-N	FE-R		EPA CONDUCTED FCE/ ON-SITE	
FE-N	II-R		EPA CFC IMPORTER INSPECTION - LEVEL 2 OR GREATER	
FE-N	L4-R		EPA CASE DEVELOPMENT INSPECTION: LEVEL 2 OR GREATR	
FE-N	L8-R		PRIMACY INSPECTION - LEVEL 2 OR GREATER	
FE-N	MM-R		EPA MULTI-MEDIA INSPECTION - LEVEL 2 OR GREATER	
FE-N	PI-R		EPA CFC PRODUCER INSPECTION - LEVEL 2 OR GREATER	
FE-N	R8-R		EPA OVERVIEW INSPECTION - LEVEL 2 OR GREATER	
FE-N	UI-R		EPA CFC USER INSPECTION - LEVEL 2 OR GREATER	
FZ-N	FZ-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE / OFF-SITE	
FS-N		07-R	STATE INSPECTION - LEVEL 2 OR GREATER	
FS-N		FS-R	STATE CONDUCTED FCE/ON-SITE	
FS-N		L9-R	STATE CASE DEVELOPMENT INSPECTION: LVL 2 OR GREATR	
FS-N		S8-R	INSPECTION BY STATE - LEVEL 2 OR GREATER	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	TI-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	TD-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	EC-R		EPA INVESTIGATION CONDUCTED	
EI-N *	E9-R		EPA INVESTIGATION INITIATED	
SC-N		SE-R	STATE INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE INVESTIGATION INITIATED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	TC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	TX-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	PE-R		EPA PCE ON-SITE REVIEW	
EX-N	51-R		EPA 114 LETTER	
EX-N	59-R		EPA CONFERENCE WITH FACILITY	
EX-N	EX-R		EPA PCE/OFF-SITE	
EX-N	MB-R		PART 63 NOTIFICATION OF COMPLIANCE STATUS	
EX-N	MG-R		PART 63 GRANTED COMPLIANCE DATE	
EX-N	MJ-R		PART 63 APPLICABILITY DETERMINATION	
EX-N	R5-R		PUBLIC NOTICE BY EPA	
EX-N	R6-R		PUBLIC HEARING BY EPA	
PS-N		13-R	STATE OPACITY READING	
PS-N		43-R	STATE COMPLAINT INSPECTION	
PS-N		44-R	STATE POINT INSPECTION	
PS-N		DH-R	EMISSION INVENTORY AUDIT (PLANT VISIT)	
PS-N		PS-R	STATE PCE ON-SITE REVIEW	
PX-N		15-R	STATE CONFERENCE WITH FACILITY	
PX-N		42-R	STATE 114 LETTER	
PX-N		B4-R	NESHAPS SEMI-ANNUAL REPORT	
PX-N		DJ-R	EMISSION INVENTORY SUBMITTED	
PX-N		K2-R	REPORT REVIEWED	
PX-N		M2-R	EXECUTION AND SUBMISSION OF CM SPEC TEST RESULT	
PX-N		M3-R	EER SUBMISSION	
PX-N		M5-R	REVIEW OF CEM TEST RESULTS	
PX-N		M6-R	REVIEW CEM DATA	
PX-N		M7-R	CEM AUDIT	
PX-N		M8-R	CEM WAIVER/ALTERNATE METHOD GRANTED	
PX-N		ME-R	PART 63 PERIODIC REPORT	
PX-N		MO-R	PART 63 NOTIFICATION OF COMPLIANCE STATUS	
PX-N		P8-R	HEARING	
PX-N		PX-R	STATE PCE OFF-SITE REVIEW	
PX-N		S5-R	PUBLIC NOTICE BY STATE	
PX-N		S6-R	PUBLIC HEARING BY STATE	
PX-N		SF-R	SELF DISCLOSED VIOLATION	

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SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 06

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
SS-N	SS-R		EPA NON-MDR STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
ST-N	ST-R		AGENCY NON-MDR STACK TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
2A-N	R9-R		SOURCE TEST CONDUCTED BY EPA	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	53-R		EPA REQ (O/O COND) STACK TEST/OBSV & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
3A-N		09-R	STATE REQ (O/O COND) STACK TEST OBSV & REVIEWED	Results Code:Pass(PP) or Fail(FF).
3A-N		16-R	NSPS PERFORMANCE TEST OBSERVED BY STATE	Results Code:Pass(PP) or Fail(FF).
3A-N		21-R	NESHAPS EMISSION TEST OBSERVED BY STATE	Results Code:Pass(PP) or Fail(FF).
3A-N		63-R	SOURCE TEST(NOT OBSERVED)	Results Code:Pass(PP) or Fail(FF).
3A-N		65-R	NSPS PERFORMANCE TEST OBSERVED BY EPA	Results Code:Pass(PP) or Fail(FF).
3A-N		75-R	NESHAPS EMISSION TEST OBSERVED BY EPA	Results Code:Pass(PP) or Fail(FF).
3A-N		91-R	NESHAPS EMISSION TEST NOT OBSERVED	Results Code:Pass(PP) or Fail(FF).
3A-N		92-R	NSPS PERFORMANCE TEST NOT OBSERVED	Results Code:Pass(PP) or Fail(FF).
3A-N		MD-R	PART 63 PERFORMANCE TEST (OWNER OPERATOR)	Results Code:Pass(PP) or Fail(FF).
3A-N		W4-R	STACK TEST BY COMPANY	Results Code:Pass(PP) or Fail(FF).
6C-N		S9-R	PERFORMANCE TEST CONDUCTED BY STATE	Results Code:Pass(PP) or Fail(FF).
TR-N		39-R	STATE REQ (O/O COND) STACK TEST NOT OBSV BUT REVED	Results code:Pass(PP) or Fail(FF).
TS-N		TS-R	STATE RECEIPT OF STACK TEST REPORT	

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	55-R		EPA NOV ISSUED	
6A-N	A9-R		NESHAPS VIOLATION LETTER	
6A-N	C1-R		EPA STAGE I NOV	
6A-N	E4-R		NSPS VIOLATION LETTER	
6A-N	L5-R		NOV ISSUED BY EPA	
6A-N	L6-R		EPA FINDING OF VIOLATION LETTER	
7A-N	Z2-R		NOTICE OF NONCOMPLIANCE (SECTION120) ISSUED	
7C-N		28-R	STATE NOTICE OF VIOLATION	
7C-N		40-R	LETTER OF VIOLATION BY STATE	
7C-N		L1-R	NOV ISSUED BY STATE	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	X3-R		FEDERAL CONSENT DECREE ISSUED	PAM1
7E-N	N1-R		EPA SECTION 167 ORDER ISSUED	PAM1
7F-N	AA-R		113(D) APO COMPLAINT FILED	PAM1
8A-N	56-R		113A ORDER ISSUED	PAM1
8A-N	69-R		NSPS ORDER BY EPA	PAM1
8A-N	77-R		NESHAPS ORDER BY EPA	PAM1
8A-N	K4-R		EPA ADMINISTRATIVE ORDER	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y3-R		EPA 113A PROHIBIT CONSTRUCTION ORDER ISSUED	PAM1
AG-N	TA-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	TP-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	P1-R		113(D) APO RECALCULATED	PAM1
C3-N		P6-R	113(D) ADMINISTRATIVE PENALTY COLLECTED PAM1	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 06

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		X2-R	STATE CONSENT DECREE ISSUED	PAM1(Total Assessed)
8C-N		18-R	NSPS ORDER BY STATE	PAM1(Total Assessed)
8C-N		23-R	NESHAPS ORDER BY STATE	PAM1(Total Assessed)
8C-N		29-R	STATE ADMINSTRATIVE ORDER	PAM1(Total Assessed)
8C-N		CN-R	COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY	PAM1(Total Assessed)
8C-N		SG-R	STATE SETTLEMENT AGREEMENT APPROV, SIGNED & ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		Z3-R	STATE ADMINISTRATIVE ORDER (W/ PENALTY)	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	57-R		EPA SIP CIVIL ACTION (REFERRAL)	PAM1
4B-N *	K3-R		EPA CIVIL ACTION (REFERRAL)	PAM1
4B-N *	K7-R		PRE-CIVIL ACTION REQUEST (REFERRAL)	PAM1
5B-N *	17-R		EPA CRIMINAL ACTION	PAM1
5B-N *	L7-R		EPA CRIMINAL ACTION	PAM1
7B-N *	Z6-R		FEDERAL CIVIL PENALTY	PAM1
AI-N *	TR-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	TN-R		NONAPPLICABILITY OF AIR TOXICS REQUIREMENTS	PAM1
1D-N *		L3-R	CRIMINAL REFERRAL	PAM1
1E-N *		N2-R	CIVIL REFERRAL TO STATE AG	PAM1
3D-N *		Z4-R	STATE CIVIL PENALTY	PAM1
9C-N		11-R	STATE CIVIL ACTION	PAM1
9C-N		19-R	NSPS CIVIL ACTION BY STATE	PAM1
9C-N		24-R	NESHAPS CIVIL ACTION BY STATE	PAM1
9C-N		L2-R	STATE CIVIL ACTION	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation				
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	N4-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	V0-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	V9-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		N6-R	STATE DAY ZERO	PLC1, Lead Agency
NH-N	NH-R	NH-R	NON-HPV DAY 0	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 06

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	V4-R	V4-R	PROP SIP OR FIP REVISION WILL LEAD TO COMPLIANCE	
2M-N	V6-R	V6-R	PROP SIP OR FIP REVISION WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	X3-R		FEDERAL CONSENT DECREE ISSUED	PAM1
7A-N	Z2-R		NOTICE OF NONCOMPLIANCE (SECTION120) ISSUED	
7E-N	N1-R		EPA SECTION 167 ORDER ISSUED	
7F-N	AA-R		113(D) APO COMPLAINT FILED	PAM1
8A-N	56-R		113A ORDER ISSUED	PAM1
8A-N	69-R		NSPS ORDER BY EPA	PAM1
8A-N	77-R		NESHAPS ORDER BY EPA	PAM1
8A-N	K4-R		EPA ADMINISTRATIVE ORDER	PAM1
8A-N	Y1-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
8A-N	Y3-R		EPA 113A PROHIBIT CONSTRUCTION ORDER ISSUED	PAM1
AG-N	TA-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	TP-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		X2-R	STATE CONSENT DECREE ISSUED	PAM1(Total Assessed)
8C-N		18-R	NSPS ORDER BY STATE	PAM1(Total Assessed)
8C-N		23-R	NESHAPS ORDER BY STATE	PAM1(Total Assessed)
8C-N		29-R	STATE ADMINSTRATIVE ORDER	PAM1(Total Assessed)
8C-N		CN-R	COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY	PAM1(Total Assessed)
8C-N		SG-R	STATE SETTLEMENT AGREEMENT APPROV, SIGNED & ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		Z3-R	STATE ADMINISTRATIVE ORDER (W/ PENALTY)	PAM1(Total Assessed)
9C-N		11-R	STATE CIVIL ACTION	PAM1
9C-N		19-R	NSPS CIVIL ACTION BY STATE	PAM1
9C-N		24-R	NESHAPS CIVIL ACTION BY STATE	PAM1
9C-N		L2-R	STATE CIVIL ACTION	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	Q5-R	Q5-R	CLOSEOUT MEMO ISSUED	
VR-N	P5-R	P5-R	STATE SETTLEMENT COMPLETED & PAID IN FULL	
VR-N	V2-R	V2-R	VIOLATION RESOLVED	
WD-N	P9-R	P9-R	WITHDRAWN	
7G-N	V3-R		SOUR RET TO COMPL BY US EPA W/ NO FURTHER ACT REQ	
2K-N		V5-R	SOUR RET TO COMPL BY STTE W/ NO FURTHER ACT REQ	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V ANNUAL COMPLIANCE CERT. DUE RCVD BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	ER-R		COMPLIANCE CERTIFICATION EPA REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	CB-R		TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	MN-R		PART 63 NEGATIVE DECLARATION OF APPLICABILITY	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 06

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	JA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	JB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	AE-R		EPA CONDUCTED FCE/ ON-SITE	
FZ-N	AZ-R		EPA CONDUCTED FCE/ OFF-SITE	
FF-N		AF-R	STATE CONDUCTED FCE/ OFF-SITE	
FS-N		AS-R	STATE CONDUCTED FCE/ ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	JE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	JF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	II-R		EPA INVESTIGATION CONDUCTED	
EI-N *	IE-R		EPA INVESTIGATION STARTED	
SC-N		IC-R	STATE INVESTIGATION CONDUCTED	
SI-N *		IS-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	JC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	JD-R		FEDERAL AIR TOXICS OFFSITE PCE	
EE-N	AG-R		COMPLAINT ON-SITE PCE (EPA)	
EM-N	AL-R		PROCESS OFF-SITE PCE (EPA)	
EO-N	AB-R		ON-SITE PCE OBSERVATION (EPA)	
EP-N	AK-R		PERMIT ON-SITE PCE (EPA)	
ES-N	AC-R		EPA CONDUCTED PCE/ ON-SITE	
ES-N	M4-R		CEM SYSTEM TEST AUDIT	
ES-N	M6-R		ACID RAIN CEM SYSTEM REVIEW	
EX-N	AD-R		EPA CONDUCTED PCE/ OFF-SITE	
PC-N		AU-R	COMPLAINT ON-SITE PCE (STATE)	
PO-N		AT-R	ON-SITE PCE OBSERVATION (STATE)	
PP-N		AV-R	PERMIT ON-SITE PCE (STATE)	
PR-N		AW-R	PROCESS OFF-SITE PCE (STATE)	
PS-N		AP-R	STATE CONDUCTED PCE/ ON-SITE	
PX-N		AX-R	STATE CONDUCTED PCE/ OFF-SITE	
PX-N		UD-R	TV MONITORING REPORT DUE/RECEIVED	
PX-N		UT-R	TV MONITORING REPORT REVIEWED BY STATE	
PX-N		WX-R	EMISSION INVENTORY DUE/RECEIVED	
PX-N		WY-R	EMISSION INVENTORY REVIEWED BY STATE	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	A8-R		EPA SOURCE TEST	Results Code:Pass(PP) or Fail(FF).Action PLLT.
2A-N	A9-R		SOURCE TEST OBSERVED BY EPA	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	AN-R		EPA REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	AO-R		EPA REQ (O/O COND) STACK TEST/OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
TT-N	AY-R		EPA RECEIPT OF STACK TEST REPORT	
3A-N		B1-R	SOURCE TEST OBSERVED BY STATE	Results Code:Pass(PP) or Fail(FF).
6C-N		A7-R	STATE STACK TEST	Results Code:Pass(PP) or Fail(FF).
TR-N		AR-R	STATE REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVD	Results code:Pass(PP) or Fail(FF).
TS-N		AQ-R	STATE RECEIPT OF STACK TEST REPORT	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	L4-R		NOV ISSUED BY EPA	
6A-N	LV-R		LETTER OF VIOLATION	
6A-N	LW-R		LOW - LETTER OF WARNING	
6A-N	X9-R		FINDING OF VIOLATION-EPA	
7A-N	L0-R		NOTICE OF NON-COMPLIANCE	
7C-N		G5-R	NOV ISSUED BY STATE	
7C-N		GG-R	LOCAL NOV	
7C-N		WE-R	OPEN BURNING -NOTICE OF VIOLATION ISSUED	
7C-N		WF-R	NOTICE OF VIOLATION ISSUED, ERP REQUESTED	
7C-N		XB-R	LETTER OF VIOLATION-STATE	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	L6-R		FEDERAL COURT DECREE ISSUED	PAM1
7E-N	EA-R		EPA SECTION 167 ORDER	PAM1
7F-N	LP-R		113(D) ADMINISTRATIVE CIVIL COMPLAINT FILED	PAM1
8A-N	E1-R		113 ORDER ISSUED	PAM1
8A-N	E3-R		113 ORDER REVISED	PAM1
8A-N	E4-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	E5-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	JG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	JH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	LG-R		113(D) PENALTY RECALCULATED	PAM1
C3-N	LK-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		G9-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
2D-N		H3-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		G6-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		G7-R	REVISED STATE ORDER	PAM1(Total Assessed)
8C-N		GE-R	SETTLEMENT AGREEMENT	PAM1(Total Assessed)
8C-N		GZ-R	STATE ORDER FINAL ASSESSED CASH PENALTY	PAM1(Total Assessed)
8C-N		WD-R	ENFORCEMENT ORDER ISSUED BY COUNTY LOCAL PROGRAM	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	L5-R		EPA CIVIL ACTION (REFERRAL)	PAM1
5B-N *	L8-R		EPA CRIMINAL ACTION	PAM1
7B-N *	L7-R		EPA CIVIL PENALTY	PAM1
AI-N *	JI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	JJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1D-N *		H5-R	STATE CRIMINAL ACTION	PAM1
1E-N *		CK-R	MACC PERMISSION TO REFER TO MO AG	PAM1
1E-N *		GA-R	STATE CIVIL REFERAL TO ST ATTORNEY GENERAL	PAM1
1E-N *		GL-R	CIVIL REFERRAL TO CITY/LOCAL GOVERNMENT ATTORNEY	PAM1
3D-N *		H4-R	STATE CIVIL PENALTY	PAM1
9C-N		H2-R	CIVIL ACTION BY STATE	PAM1

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2B-N	OB-R	OB-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	OU-R	OU-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	D0-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	OS-R		LEAD CHANGES TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	CI-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		CO-R	STATE DAY ZERO	PLC1, Lead Agency

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	CF-R	CF-R	PROP SIP OR FIP REVISION WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	L6-R		FEDERAL COURT DECREE ISSUED	PAM1
7A-N	L0-R		NOTICE OF NON-COMPLIANCE	
7E-N	EA-R		EPA SECTION 167 ORDER	
7F-N	LP-R		113(D) ADMINISTRATIVE CIVIL COMPLAINT FILED	PAM1
8A-N	E1-R		113 ORDER ISSUED	PAM1
8A-N	E3-R		113 ORDER REVISED	PAM1
8A-N	E4-R		EPA 113A SIP VIOLATION ORDER ISSUED	PAM1
8A-N	E5-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	JG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	JH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		G9-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
2D-N		H3-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		G6-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		G7-R	REVISED STATE ORDER	PAM1(Total Assessed)
8C-N		GE-R	SETTLEMENT AGREEMENT	PAM1(Total Assessed)
8C-N		GZ-R	STATE ORDER FINAL ASSESSED CASH PENALTY	PAM1(Total Assessed)
8C-N		WD-R	ENFORCEMENT ORDER ISSUED BY COUNTY LOCAL PROGRAM	PAM1(Total Assessed)
9C-N		H2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	C7-R	C7-R	CLOSEOUT MEMO ISSUED	
VR-N	CD-R	CD-R	VIOLATION RESOLVED	
WD-N	CB-R	CB-R	113(D) WITHDRAWN	
7G-N	CE-R		SOUR RET TO COMPL BY US EPA W/ NO FURTHER ACT REQ	
C3-N	LK-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	
2K-N		HB-R	SOUR RET TO COMPL BY STATE WITH NO FURTHER ACT REQ	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	UC-R	UC-R	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	UE-R		COMPLIANCE CERTIFICATION EPA REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	UB-R		TITLE V COMPLIANCE CERT. DUE/RECEIVED BY ST/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE	Results Code:MV-in violation, MC-in Compliance, MU-Unknown
SR-N		US-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	PA-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	PM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	PN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 07

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 08

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	GA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	GB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	FE-R		EPA CONDUCTED FCE/ON-SITE	
FZ-N	FZ-R		EPA CONDUCTED FCE/OFF-SITE	
FF-N		FF-R	STATE CONDUCTED FCE/OFF-SITE	
FS-N		FS-R	STATE CONDUCTED FCE/ON-SITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	GE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	GF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	EC-R		EPA INVESTIGATION CONDUCTED	
EI-N *	IE-R		EPA INVESTIGATION STARTED	
SC-N		SC-R	STATE INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	GC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	GD-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	ES-R		EPA PCE/ON-SITE	
EX-N	EX-R		EPA PCE/OFF-SITE	
PS-N		PS-R	STATE PCE/ON-SITE	
PX-N		PX-R	STATE PCE/OFF-SITE	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
SS-N	SS-R		EPA NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	TO-R		EPA REQ (O/O COND) STACK TEST/OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
TT-N	TT-R		EPA RECEIPT OF STACK TEST REPORT	
3A-N		3A-R	STATE REQ (O/O COND) STACK TEST/OBSV & REVIEWED	Results Code:Pass(PP) or Fail(FF).
ST-N		ST-R	AGENCY NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TR-N		TR-R	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).
TS-N		TS-R	STATE RECEIPT OF STACK TEST REPORT	

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	L5-R		NOV ISSUED BY EPA	
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7C-N		L1-R	NOV ISSUED BY STATE	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	X3-R		FEDERAL CONSENT DECREE ISSUED	PAM1
7E-N	K1-R		EPA 167 PSD ORDER	PAM1
7F-N	AF-R		113 (D) ADMINISTRATIVE COMPLAINT FILED	PAM1
8A-N	57-R		EPA ABATEMENT ORDER ISSUED	PAM1
8A-N	Y1-R		EPA ADMINISTRATIVE ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	GG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	GH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	AD-R		113(D) APO RECALCULATED	PAM1
C3-N	A3-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	PAM1

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 08

STATE ORDERS AND PENALTY AMOUNTS

Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		25-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	L6-R		EPA CIVIL ACTION_(REFERRAL)	PAM1
5B-N *	L7-R		EPA CRIMINAL ACTION	PAM1
7B-N *	Z6-R		EPA PENALTY SETTLEMENT	PAM1
AI-N *	GI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	GJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1D-N *		L3-R	STATE CRIMINAL ACTION	PAM1
1E-N *		K2-R	CIVIL REFERRAL TO STATE ATT. GENERAL	PAM1
3D-N *		Z4-R	STATE ADMINISTRATIVE PENALTY SETTLEMENT	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	60-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	EL-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		64-R	STATE DAY ZERO	PLC1, Lead Agency

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	V5-R	V5-R	PROPOSED SIP OR FIP REVISE WILL LEAD TO COMPLIANCE	
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	X3-R		FEDERAL CONSENT DECREE ISSUED	PAM1
7A-N	Z2-R		NOTICE OF NON-COMPLIANCE	
7E-N	K1-R		EPA 167 PSD ORDER	
7F-N	AF-R		113 (D) ADMINISTRATIVE COMPLAINT FILED	PAM1
8A-N	57-R		EPA ABATEMENT ORDER ISSUED	PAM1
8A-N	Y1-R		EPA ADMINISTRATIVE ORDER ISSUED	PAM1
8A-N	Y2-R		EPA 113A NON-SIP VIOLATION ORDER ISSUED	PAM1
AG-N	GG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	GH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		X2-R	STATE COURT DECREE ISSUED	PAM1(Total Assessed)
8C-N		25-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
C7-N	DC-R	DC-R	CLOSEOUT MEMO ISSUED	
VR-N	V2-R	V2-R	VIOLATION RESOLVED	
WD-N	AW-R	AW-R	WITHDRAWAL	
7G-N	V3-R		SOURCE RET TO COMPL BY EPA W/ NO FURTHER ACT REQ	
C3-N	A3-R		113(D) ADMINISTRATIVE PENALTY COLLECTED	
2K-N		V4-R	SOURCE RET TO COMPL BY STATE W/ NO FURTHER ACT REQ	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 08

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CC-R	CC-R	TITLE V COMPLIANCE CERT. DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
ER-N	VE-R		COMPLIANCE CERTIFICATION EPA REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	CB-R		TV ANN COMPLIANCE CERT DUE/RECVD BY STATE/LOCAL	DTS1=Due Date. DTA1=Received Date.
SR-N		VS-R	COMPLIANCE CERTIFICATION STATE REVIEW	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	NA-R		EPA MACT FCE/PCE NON-APPLICABILITY DETERMINATION	
NM-N	NM-R		EPA MACT NON-APPLICABLE DETERM FOR INVESTIGATIONS	
NN-N	NN-R		EPA NSR/PSD NON-APPLICABLE DETERMINE-INVESTIGATION	

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 09

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	EA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	EB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	BX-R		FULL COMPLIANCE EVALUATION BY EPA	
FZ-N	BY-R		FULL COMPLIANCE EVALUATION OFFSITE BY EPA	
FF-N		JX-R	FULL COMPLIANCE EVALUATION OFFSITE BY STATE	
FF-N		RX-R	FULL COMPLIANCE EVALUATION OFFSITE BY LOCAL	
FS-N		JY-R	FULL COMPLIANCE EVALUATION BY STATE	
FS-N		RY-R	FULL COMPLIANCE EVALUATION BY LOCAL - ONSITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	EE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	EF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	CE-R		EPA INVESTIGATION CONDUCTED	
EI-N *	CD-R		EPA INVESTIGATION STARTED	
SC-N		LD-R	STATE INVESTIGATION CONDUCTED	
SC-N		UD-R	LOCAL INVESTIGATION CONDUCTED	
SI-N *		LC-R	STATE INVESTIGATION STARTED	
SI-N *		UC-R	LOCAL INVESTIGATION STARTED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	EC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	ED-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	CJ-R		EPA PARTIAL INSPECTION ON-SITE	
EX-N	CK-R		EPA PARTIAL INSPECTION OFF-SITE	
PS-N		JV-R	PARTIAL ONSITE VISIT BY STATE	
PS-N		RV-R	PARTIAL ONSITE VISIT BY LOCAL	
PX-N		IL-R	STATE CEM, EER, TEST DATA REVIEW	
PX-N		JW-R	PARTIAL OFFSITE REVIEW BY STATE	
PX-N		JZ-R	RATA - STATE	
PX-N		LE-R	REVIEWED THROUGHPUT REPORTS-STATE	
PX-N		LF-R	REVIEWED ANNUAL EMISSION SUMMARY REPORTS-STATE	
PX-N		LG-R	REVIEWED BREAKDOWN/EXCESS EMISSIONS REPORTS-STATE	
PX-N		NT-R	SEMI-ANNUAL TITLE V CERTIFICATION RCVD - STATE	
PX-N		NV-R	QUARTERLY TITLE V CERTIFICATION RECEIVED - STATE	
PX-N		RC-R	PARTIAL OFFSITE REVIEW/LOCAL (INTERIM TOWARDS FCE)	
PX-N		RW-R	PARTIAL OFFSITE REVIEW BY LOCAL	
PX-N		SQ-R	RATA - DISTRICT	
PX-N		SS-R	REVIEWED ANNUAL THROUGHPUT REPORTS-DISTRICT	
PX-N		ST-R	REVIEWED ANNUAL EMISSION SUMMARY REPORTS-DISTRICT	
PX-N		SU-R	REVIEWED BREAKDOWN/EXCESS EMISSIONS REPORTS-DISTR.	
PX-N		TT-R	SEMI-ANNUAL TITLE V CERT RECEIVED - DISTRICT	
PX-N		TV-R	QUARTERLY TITLE V CERTIFICATION RECEIVED – STATE	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 09

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2A-N	AL-R		SOURCE TEST WITNESSED BY EPA	Results Code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	CI-R		EPA REVIEWS A SOURCE TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	CH-R		EPA OBSERVED SOURCE TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
3A-N		IK-R	STATE SOURCE TEST OBSERVED	Results Code:Pass(PP) or Fail(FF).
3A-N		RZ-R	DISTRICT REQ(O/O COND) SRCE TEST OBSERVD & REVIEWD	Results Code:Pass(PP) or Fail(FF).
6C-N		JU-R	SOURCE TEST CONDUCTED BY STATE	Results Code:Pass(PP) or Fail(FF).
6C-N		RJ-R	DISTRICT SOURCE TEST CONDUCTED	Results Code:Pass(PP) or Fail(FF).
6C-N		RU-R	LOCAL SOURCE TEST_CONDUCTED	Results Code:Pass(PP) or Fail(FF).
TR-N		JT-R	SOURCE TEST REVIEW BY STATE	Results code:Pass(PP) or Fail(FF).
TR-N		RT-R	SOURCE TEST REVIEW BY LOCAL	Results code:Pass(PP) or Fail(FF).

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	BB-R		EPA NOV ISSUED	
7A-N	B2-R		EPA SECTION 120 NOTICE OF NONCOMPLIANCE	
7C-N		J8-R	STATE NOV ISSUED	
7C-N		S8-R	DISTRICT NOV ISSUED	

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	BT-R		EPA CONSENT DECREE	PAM1
7E-N	BO-R		EPA SECTION 167 ORDER ISSUED	PAM1
7F-N	BE-R		EPA SECTION (D) PENALTY ORDER FILED	PAM1
7F-N	BF-R		EPA 113(D) ADMINISTRATIVE COMPLAINT	PAM1
7F-N	C4-R		NOTICE OF DETERMINATION ISSUED	PAM1
8A-N	BC-R		EPA 113 ORDER ISSUED	PAM1
AG-N	EG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	EH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
C2-N	BK-R		113D APO PENALTY RECALCULATED	PAM1
C3-N	BL-R		113D APO PENALTY COLLECTED	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		JK-R	STATE CONSENT DECREE	PAM1(Total Assessed)
2D-N		SK-R	DISTRICT CONSENT DECREE	PAM1(Total Assessed)
8C-N		J4-R	STATE NON ORDER REQUIRES COMPLIANCE	PAM1(Total Assessed)
8C-N		JE-R	STATE ADMINISTRATIVE COMPLAINT ORDER	PAM1(Total Assessed)
8C-N		JG-R	STATE MS HEARING ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		JH-R	STATE ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		JP-R	STATE LETTER ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		S4-R	LOCAL NON ORDER REQUIRES COMPLIANCE	PAM1(Total Assessed)
8C-N		SE-R	LOCAL ADMINISTRATIVE COMPLAINT ORDER	PAM1(Total Assessed)
8C-N		SG-R	LOCAL MS HEARING ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		SH-R	DISTRICT ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		SP-R	LOCAL LETTER ORDERS COMPLIANCE	PAM1(Total Assessed)

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SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 09

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N	BQ-R		EPA CIVIL ACTION_(REFERRAL)	PAM1
5B-N	BS-R		EPA CRIMINAL ACTION	PAM1
7B-N	BR-R		EPA CIVIL PENALTY ASSESSED	PAM1
AI-N	EI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	EJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENTS	PAM1
1D-N		JJ-R	STATE CRIMINAL ACTION	PAM1
1D-N		SJ-R	DISTRICT CRIMINAL ACTION	PAM1
1E-N		JN-R	STATE REFERRAL TO ATTORNEY GENERAL	PAM1
1E-N		SN-R	DISTRICT CIVIL REFERRAL TO AG	PAM1
3D-N *		JM-R	STATE CIVIL PENALTY	PAM1
3D-N *		SM-R	DISTRICT CIVIL PENALTY ASSESSED	PAM1
9C-N		JI-R	STATE CIVIL ACTION	PAM1
9C-N		SI-R	DISTRICT CIVIL ACTION	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of Violation

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2B-N	CB-R	CB-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	CC-R	CC-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	B5-R		EPA "DAY ZERO" (STARTS SV CLOCK)	PLC1, Lead Agency
DB-N	CA-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	C0-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	B9-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		J9-R	DAY ZERO BY STATE FOR AN SV	PLC1, Lead Agency
2E-N		S9-R	DISTRICT DAY 0 FOR SV	PLC1, Lead Agency

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
2M-N	AS-R	AS-R	PROPOSED SIP/FIP REVISION TO COMPLIANCE	
2M-N	DP-R	DP-R	FIP REVISION	
2M-N	MO-R	MO-R	STATE SIP REVISION	
OT-N	C3-R		OTHER EPA ADDRESSING ACTION	PAM1(Total Assessed)
OT-N	JR-R	JR-R	OTHER STATE ADDRESSING ACTION	PAM1(Total Assessed)
OT-N	SR-R	SR-R	OTHER DISTRICT ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	BT-R		EPA CONSENT DECREE	PAM1
7A-N	B2-R		EPA SECTION 120 NOTICE OF NONCOMPLIANCE	
7E-N	BO-R		EPA SECTION 167 ORDER ISSUED	
7F-N	BE-R		EPA SECTION (D) PENALTY ORDER FILED	PAM1
7F-N	BF-R		EPA 113(D) ADMINISTRATIVE COMPLAINT	PAM1
7F-N	C4-R		NOTICE OF DETERMINATION ISSUED	PAM1
8A-N	BC-R		EPA 113 ORDER ISSUED	PAM1
AG-N	EG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	EH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		JK-R	STATE CONSENT DECREE	PAM1(Total Assessed)
2D-N		SK-R	DISTRICT CONSENT DECREE	PAM1(Total Assessed)
2L-N	DO-R		EPA ISSUES SOURCE SPECIFIC REV	
2L-N		IO-R	STATE PROPOSED SIP REVISION	
2L-N		RN-R	DISTRICT SIP REVISION LEADS TO COMPLIANCE	
8C-N		J4-R	STATE NON ORDER REQUIRES COMPLIANCE	PAM1(Total Assessed)
8C-N		JE-R	STATE ADMINISTRATIVE COMPLAINT ORDER	PAM1(Total Assessed)
8C-N		JG-R	STATE MS HEARING ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		JH-R	STATE ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		JP-R	STATE LETTER ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		S4-R	LOCAL NON ORDER REQUIRES COMPLIANCE	PAM1(Total Assessed)
8C-N		SE-R	LOCAL ADMINISTRATIVE COMPLAINT ORDER	PAM1(Total Assessed)
8C-N		SG-R	LOCAL MS HEARING ORDERS COMPLIANCE	PAM1(Total Assessed)
8C-N		SH-R	DISTRICT ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		SP-R	LOCAL LETTER ORDERS COMPLIANCE	PAM1(Total Assessed)
9C-N		JI-R	STATE CIVIL ACTION	PAM1
9C-N		SI-R	DISTRICT CIVIL ACTION	PAM1

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 09

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
VR-N	BV-R		EPA SV RESOLVED	
VR-N		JO-R	STATE SV RESOLVED	
VR-N		SO-R	DISTRICT SV RESOLVED	
WD-N	BG-R	BG-R	EPA SECTION 113 (D) ACTION WITHDRAWN	
7G-N	A8-R		SOURCE RETURNED TO COMPLIANCE NFA (EPA)	
C3-N	BL-R		113D APO PENALTY COLLECTED	
2K-N		I7-R	STATE COMPLIANCE NFA	
2K-N		R7-R	LOCAL COMPLIANCE NFA	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	CG-R		EPA TITLE V CERTIFICATION DUE/RECEIVED	DTS1=Due Date. DTA1=Received Date.
ER-N	CF-R		EPA TITLE V CERTIFICATION REVIEW	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	JQ-R		TV ANNUAL COMPL. CERT DUE/RECVD BY STATE	DTS1=Due Date. DTA1=Received Date.
CB-N		RR-R	TV ANNUAL COMPLIANCE CERT DUE/RECVD BY DISTRICT	DTS1=Due Date. DTA1=Received Date.
SR-N		JS-R	TITLE V CERTIFICATION REVIEW - STATE	Results Code:MV-in violation, MC-in Compliance, MU-Unknown
SR-N		RS-R	TITLE V CERTIFICATION REVIEW - LOCAL	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

NON-APPLICABILITY DETERMINATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
NA-N	CP-R		APPLICABLE MACT	
NM-N	CQ-R		NON-APPLICABLE MACT	

Title V Permit Program Data Elements and Events

AFS Acronym	Region Use	State Use	Description-Data	Additional
			Permitting Authority Name	FIPS Tables
PAFS			AFS Plant ID Number	
PAPN			Permit Number	
APC1			Permit Air Program Code	V
PLAP			Permit Pollutant Code	Facil
SCA1			Permit Program Compliance	Current
		DP	Draft Permit	Permit Number
		DQ	Draft Permit Modification	
		PP	Date Permit Recd By EPA	
		PM	Date Permit Mod Recd by EPA	
		PE	EPA 45-Day Review Period	System Generated
		IF	Date Permit Issued	
		IM	Date Permit Modification Issued	
		IR	Permit Renewal	
	PO		Date EPA Objects to Permit	
	PL		Date EPA Objects to Permit Mod	
	PG		Date EPA Denies Revised Permit	
	PH		Date EPA Denies Revised Mod	
	PT		Date Public Petitions EPA	
	PD		Date Public Petitions EPA - Mod	
	PQ		Date EPA Action - Public Petition	

Note: please reference http://www.epa.gov/compliance/resources/publications/data/systems/air/pmtpolcy.pdf for more information on the reporting of Title V data.

Data Elements for Subparts

AFS Acronym	Region	State Use	Description-Data Elements	Additional
SPT1 APC1=9	X	X (Optional)	40 CFR Part 60 (NSPS) Subparts- Air Program Code 9	Plant Lvl
SPT1 APC1=8	X	X (Optional)	40 CFR Part 61 (NonMACT NESHAP) Subparts-Air Program Code 8	Plant Lvl
SPT1 APC1=M	X	X (Optional)	40 CFR Part 63 (MACT NESHAP) Subparts-Air Program Code M	Plant Lvl
SPT1 APC1=0	X	X (Optional)	40 CFR Part 60 - Air Program Code 0	Plant Lvl
SPT1 APC1=1	X	X (Optional)	40 CFR Part 60 - Air Program Code 1	Plant Lvl

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 10

FULL COMPLIANCE EVALUATIONS (FCE)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AA-N	AA-R		FEDERAL AIR TOXICS ONSITE FCE	
AB-N	AB-R		FEDERAL AIR TOXICS OFFSITE FCE	
FE-N	2Y-R		EPA MULTIMEDIA FCE - ONSITE	
FE-N	FE-R		EPA CONDUCTED FULL COMPLIANCE EVALUATION/ ON-SITE	
FZ-N	FZ-R		EPA CONDUCTED FULL COMPLIANCE EVALUATION/OFF-SITE	
FF-N		1A-R	AK-CONDUCTED FULL COMPLIANCE EVALUATION - OFFSITE	
FF-N		FF-R	STATE/LOCAL CONDUCTED FCE / OFF-SITE	
FS-N		2C-R	AK-CONDUCTED FULL COMPLIANCE EVALUATION - ONSITE	
FS-N		CC-R	OR STATE INSPEC-COMMITTED COMPREHEN. COMP. ON-SITE	
FS-N		CN-R	OREGON STATE INSPEC-NONCOM COMPREHEN. COMP ON-SITE	
FS-N		FS-R	STATE/LOCAL CONDUCTED FCE - ONSITE	

INVESTIGATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AE-N *	AE-R		FEDERAL AIR TOXICS INVESTIGATION INITIATED	
AF-N	AF-R		FEDERAL AIR TOXICS INVESTIGATION COMPLETED	
EC-N	EC-R		EPA INVESTIGATION CONDUCTED	
EI-N *	EI-R		EPA INVESTIGATION INITIATED	
SC-N		SC-R	STATE/LOCAL INVESTIGATION CONDUCTED	
SI-N *		SI-R	STATE/LOCAL INVESTIGATION INITIATED	

PARTIAL COMPLIANCE EVALUATIONS (PCE)-(Note: reporting State PCE's are currently an option.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
AC-N	AC-R		FEDERAL AIR TOXICS ONSITE PCE	
AD-N	AD-R		FEDERAL AIR TOXICS OFFSITE PCE	
ES-N	2F-R		EPA-MULTIMEDIA PCE/ON-SITE	
ES-N	ES-R		EPA PARTIAL COMPLIANCE EVALUATION ON-SITE	
EX-N	ED-R		EPA PARTIAL COMPLIANCE EVALUATION- SELF DISCLOSURE	
EX-N	EX-R		EPA PARTIAL COMPLIANCE EVALUATION OFF-SITE	
PS-N		PS-R	STATE/LOCAL PARTIAL COMPLIANCE EVALUATION - ONSITE	
PX-N		6A-R	AK-FACILITY OPRPT-THOROUGH REVIEW PCE OFFSITE	
PX-N		80-R	AK-PREAPP. LIMIT FUEL USAGE REPORT - PCE/OFFSITE	
PX-N		81-R	AK-ORL ANNUAL COMPLIANCE CERT - PCE OFFSITE	
PX-N		83-R	AK-SEMI-ANN. OPRPT/GENERAL PERMIT/PCE OFFSITE	
PX-N		99-R	AK-ANNUAL COMPLIANCE CERTIFICATION - PCE/OFFSITE	
PX-N		PX-R	STAE/LOCAL PARTIAL COMPLIANCE EVALUATION – OFFSITE	

STACK TESTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
SS-N	SS-R		EPA NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TE-N	TE-R		EPA REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).Action PLLT.
TO-N	TO-R		EPA REQD (/O COND) STACK TEST/OBSERVED & REVIEWED	Results code:Pass(PP) or Fail(FF).Action PLLT.
3A-N		23-R	S/L REQD (O/O CONDUCTED) STACK TEST OBSV & REVIEWD	Results Code:Pass(PP) or Fail(FF).
ST-N		SL-R	AGENCY NON-MDR STACK TEST	Results code:Pass(PP) or Fail(FF).Action PLLT.
TR-N		59-R	AK-STACK TEST REQ (O/O COND) NOT OBSV BUT REVIEWED	Results code:Pass(PP) or Fail(FF).
TR-N		TR-R	S/L REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD	Results code:Pass(PP) or Fail(FF).

NOTICE OF VIOLATIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6A-N	48-R		FINDING A VIOLATION	
6A-N	L5-R		NOV ISSUED BY EPA	
7A-N	7A-R		EPA NOTICE OF NON-COMPLIANCE (SECTION 120)	
7C-N		2N-R	NWAPA/WA - WARNING LETTER	
7C-N		84-R	IDAHO - NOV ISSUED	
7C-N		91-R	LOCAL AGENCY NOTICE OF VIOLATION	
7C-N		96-R	OR - NOTICE OF NON-COMPLIANCE	
7C-N		L1-R	NOV ISSUED BY STATE	

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 10

FEDERAL ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
6B-N	12-R		FEDERAL CONSENT AGREEMENT SIGNED	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7E-N	60-R		167 STOP CONSTRUCTION ORDER	PAM1
7F-N	7F-R		113D APO COMPLAINT FILED.	PAM1
8A-N	78-R		COMPLIANCE ORDER 113 FINAL/ISSUED	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1

STATE ORDERS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: Administrative Orders include Penalty Notices,Compliance Notices,Agreed Orders,Compliance Administrative Orders, Consent Orders or Final Orders				
2D-N		9A-R	PSCAA/WA - JUDICIAL REFERRAL	PAM1(Total Assessed)
2D-N		LA-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT ORDER ISSUED	PAM1(Total Assessed)
8C-N		09-R	WA-CIVIL PENALTIES(FORMAL ENFORCE DOC W/PENALTIES)	PAM1(Total Assessed)
8C-N		13-R	PSCAA/WA - ASSURANCE OF DISCONTINUANCE	PAM1(Total Assessed)
8C-N		2G-R	WA/CRO - NOTICE OF PENALTY	PAM1(Total Assessed)
8C-N		2P-R	NWAPA/WA - IMPOSITION OF PENALTY	PAM1(Total Assessed)
8C-N		2Q-R	NWAPA/WA - ASSURANCE OF DISCONTINUANCE	PAM1(Total Assessed)
8C-N		2R-R	SCAPCA/WA-NOTICE & ORDER OF ASSESSMENT	PAM1(Total Assessed)
8C-N		37-R	AK - COMPLIANCE ORDERS BY CONSENT (COBC)	PAM1(Total Assessed)
8C-N		61-R	IDAHO - CONSENT ORDER ISSUED	PAM1(Total Assessed)
8C-N		7D-R	ALASKA-SETTLEMENT AGREEMENT	PAM1(Total Assessed)
8C-N		93-R	MUTUAL AGREEMENT & ORDER (MAO)	PAM1(Total Assessed)
8C-N		94-R	OREGON DEPARTMENT ORDER	PAM1(Total Assessed)
8C-N		97-R	OREGON CIVIL PENALTY	PAM1(Total Assessed)
8C-N		9F-R	ORCAA-NOTICE OF CIVIL PENALTY ASSESSMENT	PAM1(Total Assessed)
8C-N		A1-R	ALASKA - NUISANCE ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		A2-R	ALASKA - EMERGENCY ORDER	PAM1(Total Assessed)
8C-N		IN-R	WDOE/ERO ISSUANCE OF NOTICE OF PENALTY ACTION	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		X4-R	ID-NOV W/PENALTY-RESOLVES W/O CONCENT ORDER OR CIV	PAM1(Total Assessed)
8C-N		XI-R	113(A)(1)SIP ORDER ISSUED BY STATE	PAM1(Total Assessed)

CIVIL AND CRIMINAL REFERRALS AND PENALTY AMOUNTS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
4B-N *	22-R		REFER TO JUSTICE DEPARTMENT	PAM1
4B-N *	L6-R		EPA CIVIL ACTION (REFERRAL)	PAM1
AI-N *	AI-R		FEDERAL AIR TOXICS REFERRAL TO DOJ	PAM1
AJ-N	AJ-R		NONAPPLICABILITY OF AIR TOXIC REQUIREMENT	PAM1
1D-N *		L3-R	STATE CRIMINAL ACTION	PAM1
1E-N *		LB-R	STATE CIVIL REFERAL TO ST ATTORNEY GENERAL	PAM1
3D-N *		88-R	STATE CIVIL PENALTY ASSESSMENT	PAM1
9C-N *		11-R	PSCAA/WA-INJUNCTIVE RELIEF	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - DAY ZERO AND LEAD CHANGES

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
Note: HPV cases contain a Day Zero action, Date Addressed, formal or informal action and Date Resolved. Any action can be linked.Comment on Day Zero documents type of violation				
2B-N	2B-R	2B-R	DAY ZERO - SHARED ENFORCEMENT LEAD	PLC1, Lead Agency
2U-N	2U-R	2U-R	DAY ZERO - ENFORCEMENT LEAD IS UNASSIGNED	PLC1, Lead Agency
2Z-N	2Z-R		FEDERAL DAY ZERO	PLC1, Lead Agency
DB-N	DB-R		LEAD CHANGED TO SHARED ENFORCEMENT	
DS-N	DS-R		LEAD CHANGED TO STATE ENFORCEMENT	
DY-N	DY-R		LEAD CHANGED TO FEDERAL ENFORCEMENT	
2E-N		SV-R	SV STATE DAY 0	PLC1, Lead Agency

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

SUGGESTED ACTION TYPES FOR AFS REPORTING: REGION 10

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - ADDRESSING ACTIONS

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
OT-N	OT-R	OT-R	OTHER ADDRESSING ACTION	PAM1(Total Assessed)
6B-N	12-R		FEDERAL CONSENT AGREEMENT SIGNED	PAM1
6B-N	X3-R		FEDERAL COURT DECREE ISSUED	PAM1
7A-N	7A-R		EPA NOTICE OF NON-COMPLIANCE (SECTION 120)	
7E-N	60-R		167 STOP CONSTRUCTION ORDER	
7F-N	7F-R		113D APO COMPLAINT FILED.	PAM1
8A-N	78-R		COMPLIANCE ORDER 113 FINAL/ISSUED	PAM1
AG-N	AG-R		FEDERAL AIR TOXICS ADMINISTRATIVE ORDER	PAM1
AH-N	AH-R		FEDERAL AIR TOXICS ADMINISTRATIVE PENALTY ORDER	PAM1
2D-N		LA-R	STATE CONSENT AGREEMENT ISSUED	PAM1(Total Assessed)
2D-N		X2-R	STATE COURT ORDER ISSUED	PAM1(Total Assessed)
8C-N		09-R	WA-CIVIL PENALTIES(FORMAL ENFORCE DOC W/PENALTIES)	PAM1(Total Assessed)
8C-N		13-R	PSCAA/WA - ASSURANCE OF DISCONTINUANCE	PAM1(Total Assessed)
8C-N		2G-R	WA/CRO - NOTICE OF PENALTY	PAM1(Total Assessed)
8C-N		2R-R	SCAPCA/WA-NOTICE & ORDER OF ASSESSMENT	PAM1(Total Assessed)
8C-N		37-R	AK - COMPLIANCE ORDERS BY CONSENT (COBC)	PAM1(Total Assessed)
8C-N		61-R	IDAHO - CONSENT ORDER ISSUED	PAM1(Total Assessed)
8C-N		7D-R	ALASKA-SETTLEMENT AGREEMENT	PAM1(Total Assessed)
8C-N		93-R	MUTUAL AGREEMENT & ORDER (MAO)	PAM1(Total Assessed)
8C-N		94-R	OREGON DEPARTMENT ORDER	PAM1(Total Assessed)
8C-N		9F-R	ORCAA-NOTICE OF CIVIL PENALTY ASSESSMENT	PAM1(Total Assessed)
8C-N		A1-R	ALASKA - NUISANCE ABATEMENT ORDER	PAM1(Total Assessed)
8C-N		A2-R	ALASKA - EMERGENCY ORDER	PAM1(Total Assessed)
8C-N		IN-R	WDOE/ERO ISSUANCE OF NOTICE OF PENALTY ACTION	PAM1(Total Assessed)
8C-N		X1-R	STATE ORDER ISSUED	PAM1(Total Assessed)
8C-N		X4-R	ID-NOV W/PENALTY-RESOLVES W/O CONCENT ORDER OR CIV	PAM1(Total Assessed)
8C-N		XI-R	113(A)(1)SIP ORDER ISSUED BY STATE	PAM1(Total Assessed)
9C-N		11-R	PSCAA/WA-INJUNCTIVE RELIEF	PAM1
9C-N		L2-R	CIVIL ACTION BY STATE	PAM1

HIGH PRIORITY VIOLATOR (HPV) ACTION LINKING - HPV RESOLVED

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
VR-N	VR-R	VR-R	VIOLATION RESOLVED	
7G-N	7G-R		EPA-HPV RESOLVED-RET TO COMPL W/NO ENFORCEMENT ACT	
2K-N		2K-R	STATE - SRC RETRND TO COMPLIANCE W/NO FURTHER ACTN	

TITLE V SELF CERTIFICATIONS AND COMPLIANCE STATUS(Note: contains new CMS requirements.)

National	Region	State	REGIONAL ACTION DESCRIPTION:	Additional Requirements
CC-N	C1-R	C1-R	TITLE V ANNUAL CERT DUE/RECEIVED BY EPA	DTS1=Due Date. DTA1=Received Date.
CC-N	T4-R	T4-R	TITLE 71 ANNUAL COMPL CERT DUE/RECVD - TRIBAL	DTS1=Due Date. DTA1=Received Date.
ER-N	41-R		T-V ANNUAL COMPLIANCE CERT REVIEWED BY EPA	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
ER-N	T5-R		TITLE 71 ANNUAL COMPL CERT REVIEWED - TRIBAL	Results Code:MV-in Violation,MC-in Compliance,MU-Unknown RDE8=Deviation,Y-Yes or N-No.
CB-N	DA-R		TV ANN COMPL CERT DUE/RCVD BY PERMIT AUTHORITY	DTS1=Due Date. DTA1=Received Date.
SR-N		SR-R	TV ANNUAL COMPL. CERT REVIEW BY PERMIT AUTHORITY	Results Code:MV-in violation, MC-in Compliance, MU-Unknown

An "*" (in the National Column) indicates that the Action Type is an Enforcement Sensitive Action

Appendix 3b

AFS National Action Types Applicable for Tribal Activity

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4/11/2006

AFS NATIONAL ACTION TYPES FOR USE IN DOCUMENTING TRIBAL ACTIVITY

Activity completed at a source located within a tribal authority by tribal inspectors with federal credentials (without the use of federal resources) or by tribal inspectors with delegated CAA program authority should be reported to AFS using the following national action types:

NATL ACT TYPE	SHORT DESCRIPTION	LONG DESCRIPTION
Full Compliance Evaluations (FCEs)		
T1	TRIBAL FCE ON	TRIBAL ONSITE FCE
T2	TRIBAL FCE OFF	TRIBAL OFFSITE FCE
Partial Compliance Evaluations (PCEs)		
T3	TRIBAL PCE ON	TRIBAL ONSITE PCE
T4	TRIBAL PCE OFF	TRIBAL OFFSITE PCE
T5	TRIBAL PCE COMP	TRIBAL ONSITE COMPLAINT PCE
T6	TRIBAL PCE OBS	TRIBAL ONSITE OBSERVATION PCE
T7	TRIBAL PCE PER	TRIBAL ONSITE PERMIT PCE
T8	TRIBAL PCE PRO	TRIBAL OFFSITE PROCESS PCE
Investigations		
TA	TRIBAL INV STAR	TRIBAL INVESTIGATION STARTED/INITIATED
TB	TRIBAL INV COND	TRIBAL INVESTIGATION CONDUCTED/CONCLUDED
Stack Tests		
TC	TRIBAL STACK	TRIBAL SOURCE TEST CONDUCTED
TD	TRIBAL STACK NO	TRIBAL AUTHORITY REQUIRED (OWNER/OPERATOR CONDUCTED) TEST NOT OBSERVED BUT REVIEWED
TF	TRIBAL STACK OR	TRIBAL UTHORITY REQUIRED (OWNER/OPERATOR CONDUCTED) K TEST OBSERVED AND REVIEWED
Title V Annual Compliance Certifications (TV ANN CERTs)		
TG	TRIBAL TV RECD	TV ANN COMPL CERT DUE/RECEIVED BY TRIBAL AUTHORITY
TH	TRIBAL TV REVD	TV ANN COMPL CERT REVIEWED BY TRIBAL AUTHORITY
MACT Non-Applicability		
TM	TRIBAL MACT NA	TRIBAL MACT FCE/PCE NON-APPLICABILITY DETERMINATION

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Appendix 3c

AFS National Action Types Allowable as Duplicate Actions

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AFS National Action Types Allowable as Duplicates

Normally, action records are reported to AFS with unique action types and dates. There are a few instances were actions happening on the same day are allowable.

The following National Action Types are allowed to be reported to AFS multiple times with the same date achieved:

2A	EPA SOURCE TEST CONDUCTED
3A	OWNER/OPERATOR – CONDUCTED SOURCE TEST
6A	EPA NOV ISSUED
6C	ST SOURCE TEST CONDUCTED
7C	STATE NOV ISSUED
8A	EPA 113(A) ORDER ISSUED
8C	STATE ADMINISTRATIVE ORDER ISSUED
CB	TV ANNUAL COMPLIANCE CERT DUE/RECVD BY STATE/LOCAL
CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA
ER	TITLE V COMPLIANCE CERTIFICATION REVIEW BY EPA
ES	EPA CONDUCTED PCE/ ON-SITE
EX	EPA PCE/OFF-SITE
PS	STATE PCE / ON-SITE
PX	STATE PCE / OFF-SITE
SR	TITLE V COMPLIANCE CERTIFICATION REVIEW BY STATE TE EPA
REQ	(O/O COND) STACK TEST/NOT OBSV BUT REVWD
TO	EPA REQ(O/O COND) STACK TEST/OBSERVED & REVIEWED
TR	STATE REQ (O/O COND) STACK TEST/NOT OBSV BUT REVWD
TS	STATE RECEIPT OF STACK TEST REPORT

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Appendix 4

Listing of Local Control Table Values for AFS

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LOCAL CONTROL REGION CODES

Mar-09

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
01	00	STATE JURISDICTION	N	AL
01	01	JEFFERSON COUNTY	N	AL
01	02	HUNTSVILLE	N	AL
02	A1	METLAKATLA TRIBE	Y	AK
02	US	EPA JURISDICTION	N	AK
02	00	STATE JURISDICTION	N	AK
04	A1	Ak-Chin Community Council (Maricopa Reservation)	Y	AZ
04	A2	Yavapai-Prescott Reservation (Yavapai-Prescott Board of Directors)	Y	AZ
04	A3	Oljatoh Reservation (western Navajo Agency)	Y	AZ
04	00	ARIZONA DEPT OF ENVIRONMENTAL QUALITY (GRANTEE)	N	AZ
04	01	MARICOPA COUNTY AIR POLLUTION CONTROL AGENCY (GRANTEE)	N	AZ
04	02	PIMA COUNTY AIR POLLUTION CONTROL DISTRICT (GRANTEE)	N	AZ
04	03	PINAL COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	AZ
04	11	Ak-Chin Community Council (Maricopa Reservation)	Y	AZ
04	12	Beclabito Reservation (Shiprock Agency)	Y	AZ
04	13	Blue Gap Reservation (Chinle Agency)	Y	AZ
04	14	Blue Springs Reservation (Western Navajo Agency)	Y	AZ
04	15	Broadway Reservation (Western Navajo Agency)	Y	AZ
04	16	Cameron Reservation (Western Navajo Agency)	Y	AZ
04	17	Camp Verde (Truxton Cannon Agency)	Y	AZ
04	18	Chilchinbeto Reservation (Western Navajo Agency)	Y	AZ
04	19	Chinle Reservation (Chinle Agency)	Y	AZ
04	20	Coalmine Reservation (Western Navajo Agency)	Y	AZ
04	21	Cocopah Reservation (Cocopah Tribal Council)	Y	AZ
04	22	Colorado Indian Tribes Council (CRIT Tribal Council)	Y	AZ
04	23	Copper Mine Reservation (Western Navajo Agency)	Y	AZ
04	24	Cornfields Reservation (Fort Defiance Agency)	Y	AZ
04	25	Coyote Canyon Reservation (Fort Defiance Agency)	Y	AZ
04	26	Crystal Reservation (Fort Defiance Agency)	Y	AZ
04	27	Denehosto Reservation (Western Navajo Agency)	Y	AZ
04	28	Dilkon Community (Western Navajo Agency)	Y	AZ
04	29	Forest Lake Reservation (Chinle Agency)	Y	AZ
04	30	Fort Apache Reservation	Y	AZ
04	31	Fort Defiance Reservation (Fort Defiance Agency)	Y	AZ
04	32	Fort McDowell	Y	AZ
04	33	Fort Mojave Reservation (Colorado River Agency)	Y	AZ
04	34	Fort Yuma Reservation (Fort Yuma Agency)	Y	AZ
04	35	Fort Yuma Reservation (Quechan Tribal Council)	Y	AZ
04	36	Ganado Reservation (Fort Defiance Agency)	Y	AZ
04	37	Gila Bend Reservation	Y	AZ
04	38	Gila River Indian Community Council	Y	AZ
04	39	Gila River reservation	Y	AZ
04	40	Greasewood Reservation (Fort Defiance Agency)	Y	AZ
04	41	Havasupai	Y	AZ

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
04	42	Hopi	Y	AZ
04	43	Houck Reservation (Fort Defiance Agency)	Y	AZ
04	44	Hulapai	Y	AZ
04	45	Inscription House Reservation (Western Navajo Agency)	Y	AZ
04	46	ITCA	Y	AZ
04	47	Jeddito Reservation (Fort Defiance Agency)	Y	AZ
04	48	Kaibito Reservation (Western Navajo Agency)	Y	AZ
04	49	Kaibob Reservation (Kaibob Paiute Tribal Council)	Y	AZ
04	50	Kayenta Reservation (Western Navajo Agency)	Y	AZ
04	51	Kinlichee Reservation (Fort Defiance Agency)	Y	AZ
04	52	Klagetoh Reservation (Fort Defiance Agency)	Y	AZ
04	53	Las Vegas Paiute Tribe	Y	AZ
04	54	Lechee reservation (Western Navajo Agency)	Y	AZ
04	55	Leupp Reservation (Western Navajo Agency)	Y	AZ
04	56	Low Mountain Reservation (Fort Defiance Agency)	Y	AZ
04	57	Lukachukai Reservation (Chinline Agency)	Y	AZ
04	58	Lupton Reservation (Fort Defiance Agency)	Y	AZ
04	59	Many Farms Reservation (Chinline Agency)	Y	AZ
04	60	Mexican Springs Reservation (Fort Defiance Agency)	Y	AZ
04	61	Mexican Waters Reservation (Shiprock Agency)	Y	AZ
04	62	Moapa	Y	AZ
04	63	Naschitti Reservation (Western Navajo Agency)	Y	AZ
04	64	Navajo Mountain Reservation (Western Navajo Agency)	Y	AZ
04	65	Navajo Nation	Y	AZ
04	66	Nazlini Reservation (Chinline Agency)	Y	AZ
04	67	Oak Springs Reservation (Fort Defiance Agency)	Y	AZ
04	68	Pascua-Yaqui Indian Community (Pascua-Yacqui Tribal Council)	Y	AZ
04	69	Pinon Reservation (Chinle Agency)	Y	AZ
04	70	Quechan Tribe	Y	AZ
04	71	Red Lake Reservation (Fort Defiance Agency)	Y	AZ
04	72	Red Lake Reservation (Western Navajo Agency))	Y	AZ
04	73	Red Mesa Reservation (Shiprock Agency)	Y	AZ
04	74	Red Rock Reservation (Shiprock Agency)	Y	AZ
04	75	Rough Rock Reservation (Chinle Agency)	Y	AZ
04	76	Round Rock Reservation (Chinline Agency)	Y	AZ
04	77	Salt River Reservation (Salt River Pima-Maricopa Indian Community)	Y	AZ
04	78	San Carlos Apache Reservation (San Carlos Tribal Council)	Y	AZ
04	79	San Juan Southern Paiute Council (Southern Paiute Field Station)	Y	AZ
04	80	San Xavier Reservation (Papago Agency)	Y	AZ
04	81	Sanotsee Reservation (Shiprock Agency)	Y	AZ
04	82	Sawmill Reservation (Fort Defiance Agency)	Y	AZ
04	83	Shonto Reservation (Western Navajo Agency)	Y	AZ
04	84	St. Michaels Reservation (Fort Defiance Agency)	Y	AZ
04	85	Steamboat Reservation (Fort Defiance Agency)	Y	AZ

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
04	86	Teecnospos Reservation (Shiprock Agency)	Y	AZ
04	87	Teesto Reservation (Fort Defiance Agency)	Y	AZ
04	88	Tohono O'odham (Sells Reservation)(Tohono O'odham Council)	Y	AZ
04	89	Tolani Lake Reservation (Western Navajo Agency)	Y	AZ
04	90	Tonto Apache Reservation (Tonto Apache Tribal Council)	Y	AZ
04	91	Tsalie-Wheatfields Reservation (Chinle Agency)	Y	AZ
04	92	Tselani Reservation (Chinline Agency)	Y	AZ
04	93	Tuba City Reservation (Western Navajo Agency)	Y	AZ
04	94	Twin Lakes Reservation (Fort Defiance Agency)	Y	AZ
04	95	White Cone Reservation (Fort Defiance Agency)	Y	AZ
04	96	White Mountain Apache Tribal Council	Y	AZ
04	97	Wide Ruins Reservation (Fort Defiance Agency)	Y	AZ
04	98	NAVAJO NATION	Y	AZ
04	99	EPA REGION 9'S SPECIAL JURISDICTION	N	AZ
05	00	STATE JURISDICTION	N	AR
05	01	DISTRICT 1	N	AR
05	02	DISTRICT 2	N	AR
05	03	DISTRICT 3	N	AR
05	04	DISTRICT 4	N	AR
05	05	DISTRICT 5	N	AR
05	06	DISTRICT 6	N	AR
05	07	DISTRICT 7	N	AR
05	08	DISTRICT 8	N	AR
05	09	DISTRICT 9	N	AR
05	10	DISTRICT 10	N	AR
05	11	DISTRICT 11	N	AR
05	12	DISTRICT 12	N	AR
05	13	DISTRICT 13	N	AR
06	A0	Mooretown	Y	CA
06	A1	Lone Pine	Y	CA
06	A2	Los Cayotes	Y	CA
06	A3	Lower Lake	Y	CA
06	A4	Lytton	Y	CA
06	A5	Manchester/Pt. Arena Pomo Indians	Y	CA
06	A6	Manzanita	Y	CA
06	A7	Mechoopda (Chico)	Y	CA
06	A8	Mesa Grande	Y	CA
06	A9	Middletown	Y	CA
06	B0	Pinoleville	Y	CA
06	B1	Morongo	Y	CA
06	B2	NAEPC	Y	CA
06	B3	North Fork	Y	CA
06	B4	OVIWC	Y	CA
06	B5	Pala	Y	CA
06	B6	Paskenta	Y	CA
06	B7	Pauma	Y	CA
06	B8	Pechanga	Y	CA
06	B9	Picayune	Y	CA
06	C0	Robinson	Y	CA

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
06	C1	Pit River	Y	CA
06	C2	Potter Valley	Y	CA
06	C3	Quartz Valley	Y	CA
06	C4	Quechan	Y	CA
06	C5	Ramona	Y	CA
06	C6	Redding	Y	CA
06	C7	Redwood Valley	Y	CA
06	C8	Resighini	Y	CA
06	C9	Rincon	Y	CA
06	D0	Sherwood Valley	Y	CA
06	D1	Round Valley (Covelo)	Y	CA
06	D2	Rumsey	Y	CA
06	D3	San Manuel	Y	CA
06	D4	San Pasqual	Y	CA
06	D5	Santa Rosa Rancheria	Y	CA
06	D6	Santa Rosa Reservation	Y	CA
06	D7	Santa Ynez	Y	CA
06	D8	Santa Ysabel	Y	CA
06	D9	Scotts Valley	Y	CA
06	E0	Trinidad	Y	CA
06	E1	Shingle Springs	Y	CA
06	E2	Smith River	Y	CA
06	E3	Soboboa	Y	CA
06	E4	Stewarts Point/Kashia Band	Y	CA
06	E5	Susanville	Y	CA
06	E6	Sycuan	Y	CA
06	E7	Table Mountain	Y	CA
06	E8	Timbi-sha	Y	CA
06	E9	Torres Martinez	Y	CA
06	F0	Laytonville Rancheria	Y	CA
06	F1	Tule River	Y	CA
06	F2	Tuolumne	Y	CA
06	F3	Twenty Nine Palms	Y	CA
06	F4	Upper Lake/Habematolel	Y	CA
06	F5	Viejas (Capitan Grande)	Y	CA
06	F6	Wiyot	Y	CA
06	F7	Yurok	Y	CA
06	F8	Chico Rancheria	Y	CA
06	F9	Colusa Rancheria	Y	CA
06	G1	Table Bluff Rancheria	Y	CA
06	00	CA AIR RESOURCES BOARD (NO REPORTABLE SOURCES) (GRANTEE)	N	CA
06	01	BAY AREA AIR QUALITY MANAGEMENT DISTRICTURCES) (GRANTEE)	N	CA
06	02	IMPERIAL COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	03	SAN JOAQUIN VALLEY UNIFIED AIR POLLUTIONSTRICT (GRANTEE)	N	CA
06	04	VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT (GRANTEE)	N	CA
06	05	PLACER COUNTY AIR POLLUTION CONTROL DISTRICT	N	CA

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
		(NON-GRANTEE)		
06	06	AMADOR COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	07	BUTTE COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	08	CALAVERAS COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	09	COLUSA COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	10	EL DORADO COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	11	FEATHER RIVER AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	12	GLENN COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	13	GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	14	KERN COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	15	LAKE COUNTY AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	16	LASSEN COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	17	MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	18	MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT (GRANTEE)	N	CA
06	19	NORTH COAST UNIFIED AIR QUALTY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	20	NORTHERN SIERRA AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	21	NORTHERN SONOMA AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	22	SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT (GRANTEE)	N	CA
06	23	SAN DIEGO COUNTY AIR POLLUTION CONTROL DISTRICT (GRANTEE)	N	CA
06	24	SAN LUIS OBISPO COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	25	MARIPOSA COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	26	MENDOCINO COUNTY AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	27	MODOC COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	28	SANTA BARBARA COUNTY AIR POLLUTION CONTROL DISTRICT (GRANTEE)	N	CA
06	29	SHASTA COUNTY AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	30	SISKIYOU COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
06	31	SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (GRANTEE)	N	CA
06	32	TEHAMA COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	33	TUOLUMNE COUNTY AIR POLLUTION CONTROL DISTRICT (NON-GRANTEE)	N	CA
06	34	YOLO SOLANO AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	35	ANTELOPE VALLEY AIR QUALITY MANAGEMENT DISTRICT (NON-GRANTEE)	N	CA
06	40	Agua Caliente	Y	CA
06	41	Agustine	Y	CA
06	42	Alturas Rancheria	Y	CA
06	43	Auburn	Y	CA
06	44	Barona	Y	CA
06	45	Bear River	Y	CA
06	46	Benton/UtuUtu Gwaitu	Y	CA
06	47	Berry Creek	Y	CA
06	48	Big Lagoon	Y	CA
06	49	Big Pine	Y	CA
06	50	Big Sandy	Y	CA
06	51	Big Valley	Y	CA
06	52	Bishop Paiute Tribe	Y	CA
06	53	Blue Lake	Y	CA
06	54	Bridgeport	Y	CA
06	55	Buena Vista	Y	CA
06	56	Buena Vista	Y	CA
06	57	CA Valley Miwok (Sheep Ranch)	Y	CA
06	58	Cabazon	Y	CA
06	59	Cachil Dehe Band (Colusa)	Y	CA
06	60	Cahto (Laytonville)	Y	CA
06	61	Cahuilla	Y	CA
06	62	Campo Band of Kameyaay Indians	Y	CA
06	63	Cedarville Rancheria	Y	CA
06	64	Chemehuevi	Y	CA
06	65	Chicken Ranch	Y	CA
06	66	Cloverdale	Y	CA
06	67	Cocopah	Y	CA
06	68	Cold Springs	Y	CA
06	69	Cortina	Y	CA
06	70	Coyote Valley	Y	CA
06	71	CRIT	Y	CA
06	72	Cuyapaipe	Y	CA
06	73	Dry Creek	Y	CA
06	74	Duckwater	Y	CA
06	75	Elem	Y	CA
06	76	Elk Valley	Y	CA
06	77	Ely	Y	CA
06	78	Enterprise	Y	CA
06	79	Fort Bidwell	Y	CA
06	80	Fort Independence	Y	CA

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
06	81	Fort Mojave	Y	CA
06	83	Goshute	Y	CA
06	84	Graton	Y	CA
06	85	Greenville	Y	CA
06	86	Grindstone	Y	CA
06	87	Guidville	Y	CA
06	88	Hoopa	Y	CA
06	89	Hopland	Y	CA
06	90	Inaja	Y	CA
06	91	Ione	Y	CA
06	92	ITCC	Y	CA
06	93	Jackson	Y	CA
06	94	Jamul	Y	CA
06	95	Karuk	Y	CA
06	96	La Jolla	Y	CA
06	97	LaPosta	Y	CA
06	99	EPA REGION 9'S SPECIAL JURISDICTION	N	CA
08	00	STATE JURISDICTION	N	CO
08	92	SOUTHERN UTE INDIAN TRIBE	Y	CO
08	98	UTE MOUNTAIN UTE TRIBE	Y	CO
09	00	STATE JURISDICTION	N	CT
10	00	STATE JURISDICTION	N	DE
11	00	STATE JURISDICTION	N	DC
12	00	STATE JURISDICTION	N	FL
13	00	STATE JURISDICTION	N	GA
15	00	HAWAII DEPT OF HEALTH, CLEAN AIR BRANCH (GRANTEE)	N	HI
15	99	EPA REGION 9'S SPECIAL JURISDICTION	N	HI
16	BO	IDEQ - BOISE REGIONAL OFFICE	N	ID
16	CO	IDEQ - COUER DE'ALENE REGIONAL OFFICE	N	ID
16	IF	IDEQ - IDAHO FALLS REGIONAL OFFICE	N	ID
16	I1	IDEQ-COEUR D'ALENE REGIONAL OFFICE	N	ID
16	I2	KOOTENAI TRIBE OF IDAHO	Y	ID
16	I3	NEZ PERCE TRIBE OF IDAHO	Y	ID
16	I4	SHOSHONE BANNOCK TRIBES	Y	ID
16	LO	IDEQ - LEWISTON REGIONAL OFFICE	N	ID
16	OS	IDEQ - OUT OF STATE PORTABLE FACILITY	N	ID
16	PO	IDEQ - POCATELLO REGIONAL OFFICE	N	ID
16	TF	IDEQ - TWIN FALLS REGIONAL OFFICE	N	ID
16	UK	IDEQ - PORTABLE FACILITY WHEN LOCATION IS UNKNOWN	N	ID
16	US	EPA JURISDICTION	N	ID
16	00	STATE JURISDICTION	N	ID
17	00	STATE JURISDICTION	N	IL
18	00	STATE JURISDICTION	N	IN
19	00	STATE JURISDICTION	N	IA
19	01	POLK COUNTY	N	IA
19	02	LINN COUNTY	N	IA
20	00	STATE JURISDICTION	N	KS
21	00	STATE JURISDICTION	N	KY
21	01	JEFFERSON COUNTY	N	KY
22	00	STATE JURISDICTION	N	LA
23	CM	CENTRAL MAINE REGION	N	ME

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
23	EM	EASTERN MAINE REGION	N	ME
23	SM	SOUTHERN MAINE REGION	N	ME
23	00	STATE JURISDICTION	N	ME
24	00	STATE JURISDICTION	N	MD
25	00	STATE JURISDICTION	N	MA
25	01	MA WESTERN REGION	N	MA
25	02	MA CENTRAL REGION	N	MA
25	03	MA NORTHEAST REGION	N	MA
25	04	MA SOUTHEAST REGION	N	MA
26	00	STATE JURISDICTION	N	MI
26	01	BAY MILLS INDIAN COMMUNITY	Y	MI
26	02	CHIPPEWA-OTTAWA RESOURCE AUTHORITY	Y	MI
26	03	GRAND TRAVERSE BAND OF OTTAWA & CHIPPEWA	Y	MI
26	04	HANNAHVILLE INDIAN COMMUNITY	Y	MI
26	05	INTER-TRIBAL COUNCIL OF MICHIGAN	Y	MI
26	06	KEWEENAW BAY INDIAN COMMUNITY	Y	MI
26	07	LAC VIEUX DESERT BAND OF CHIPPEWA	Y	MI
26	08	LITTLE RIVER BAND OF OTTAWA	Y	MI
26	09	LITTLE TRAVERSE BAY BANDS OF ODAWA	Y	MI
26	10	MATCH-E-BE-NASH-SHE-WISH BAND OF POTTAWATOMI	Y	MI
26	11	NOTTAWASEPPI HURON POTAWATOMI	Y	MI
26	12	POKAGON BAND OF POTAWATOMI	Y	MI
26	13	SAGINAW CHIPPEWA INDIAN TRIBE	Y	MI
26	14	SAULT STE. MARIE TRIBE OF CHIPPEWA	Y	MI
27	00	STATE JURISDICTION	N	MN
27	01	BOIS FORTE BAND OF CHIPPEWA	Y	MN
27	02	FOND DU LAC BAND OF CHIPPEWA	Y	MN
27	03	GRAND PORTAGE BAND OF CHIPPEWA	Y	MN
27	04	LEECH LAKE TRIBE OF OJIBWE	Y	MN
27	05	LOWER/UPPER SIOUX COMMUNITIES	Y	MN
27	06	MILLE LACS BAND OF OBJIBWE	Y	MN
27	07	MINNESOTA CHIPPEWA TRIBE	Y	MN
27	08	PRAIRE ISLAND INDIAN COMMUNITY	Y	MN
27	09	RED LAKE BAND OF CHIPPEWA	Y	MN
27	10	SHAKOPEE MDEWAKANTON SIOUX COMMUNITY	Y	MN
27	11	WHITE EARTH BAND OF CHIPPEWA	Y	MN
28	00	STATE JURISDICTION	N	MS
29	00	STATE JURISDICTION	N	MO
30	00	STATE JURISDICTION	N	MT
30	74	BLACKFEET TRIBE	Y	MT
30	76	CHIPPEWA CREE TRIBE	Y	MT
30	77	CONFEDERATED SALISH & KOOTENAI TRIBES	Y	MT
30	78	CROW TRIBE	Y	MT
30	82	GROS VENTRE & ASSINIBOINE TRIBES	Y	MT
30	84	NORTHERN CHEYENNE TRIBE	Y	MT
31	01	STATE JURISDICTION	N	NE
31	02	LINCOLN - LANCASTER COUNTY	N	NE
31	03	CITY OF OMAHA	N	NE
32	00	NEVADA DIVISION OF ENVIRONMENTAL PROTECTION (GRANTEE)	N	NV
32	01	CLARK COUNTY HEALTH DISTRICT AIR POLLUTION	N	NV

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
		CONTROL (GRANTEE)		
32	02	WASHOE COUNTY DISTRICT HEALTH DEPARTMENTON (GRANTEE)	N	NV
32	11	Battle Mountain	Y	NV
32	12	Carson Indian Colony	Y	NV
32	13	Dresslerville Indian Colony	Y	NV
32	14	Duck Valley	Y	NV
32	15	Elko Indian Colony	Y	NV
32	16	Ely Indian Colony	Y	NV
32	17	Fallon Reservation & Colony (Fallon Business Council)	Y	NV
32	18	Fort McDermitt Reservation (Fort McDermitt Tribal Council)	Y	NV
32	19	ITCN	Y	NV
32	20	Las Vegas Indian Colony (Las Vegas Colony Council) Las Vegas Paiute Tribe	Y	NV
32	21	Lovelock Indian Colony (Lovelock Tribal Council)	Y	NV
32	22	Moapa River Indian Reservation (Moapa Business Council)	Y	NV
32	23	Pyramid Lake Reservation (Pyramid Lake Paiute Tribal Council) Pyramid Lake	Y	NV
32	24	Reno-Sparks Indian Colony (Reno-Sparks Tribal Council) Reno/Sparks Indian C	Y	NV
32	25	Ruby Valley (Te-moak) Reservation (Tribal Council of the Te-Moak Western Sh	Y	NV
32	26	Shoshone-Paiute Tribes	Y	NV
32	27	South Fork Indian Colony (South Fork Band Council)	Y	NV
32	28	Stewart Indian Colony (Stewart Indian Community Council)	Y	NV
32	29	Summit Lake Reservation (Summit Lake Paiute Council)	Y	NV
32	30	Walker River Reservation (Walker River Paiute Tribal Council)	Y	NV
32	31	Washoe Tribal Council	Y	NV
32	32	Wells Indian Colony	Y	NV
32	33	Winnemucca Indian Colony	Y	NV
32	34	Yerington Paiute Tribal Council	Y	NV
32	35	Yomba	Y	NV
32	99	EPA REGION 9'S SPECIAL JURISDICTION	N	NV
33	00	STATE JURISDICTION	N	NH
34	00	STATE JURISDICTION	N	NJ
35	00	STATE JURISDICTION	N	NM
35	01	CITY OF ALBUQUERQUE	N	NM
35	98	NAVAJO NATION	Y	NM
35	99	EPA JURISDICTION	N	NM
36	ON	ONEIDA NATION	Y	NY
36	SN	SENECA NATION	Y	NY
36	00	STATE JURISDICTION	N	NY
37	00	STATE JURISDICTION	N	NC
37	01	ARO-ASHEVILLE REGIONAL OFFICE	N	NC

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
37	03	MRO-MOORESVILLE REGIONAL OFFICE	N	NC
37	04	WSRO-WINSTON SALEM REGIONAL OFFICE	N	NC
37	05	RRO-RALEIGH REGIONAL OFFICE	N	NC
37	06	FRO-FAYETTEVILLE REGIONAL OFFICE	N	NC
37	07	WARO-WASHINGTON REGIONAL OFFICE	N	NC
37	08	WIRO-WILMINGTON REGIONAL OFFICE	N	NC
37	09	BUNCOMBE COUNTY	N	NC
37	10	FORSYTH COUNTY	N	NC
37	11	MECKLENBURG COUNTY	N	NC
37	12	EPA JURISDICTION	N	NC
38	00	STATE JURISDICTION	N	ND
38	93	SPIRIT LAKE TRIBE	Y	ND
38	94	STANDIND ROCK SIOUX TRIBE	Y	ND
38	95	THREE AFFILIATED TRIBES	Y	ND
38	96	TURTLE MOUNTAIN BAND OF CHIPPEWAS	Y	ND
39	00	STATE JURISDICTION	N	OH
40	00	STATE JURISDICTION	N	OK
41	ER	ODEQ - EASTERN REGIONAL OFFICE	N	OR
41	NW	ODEQ - NORTHWEST REGIONAL OFFICE	N	OR
41	R1	BURNS PAIUTE	Y	OR
41	R2	COOS, LOWER UMPQUA & SIUSLAW	Y	OR
41	R3	COQUILLE INDIAN TRIBE	Y	OR
41	R4	COW CREEK BAND OF UMPQUA TRIBES OF INDIANS	Y	OR
41	R5	CONFEDERATED TRIBES OF GRAND RONDE	Y	OR
41	R6	KLAMATH INDIAN TRIBE	Y	OR
41	R7	SILETZ CONFEDERATED TRIBES	Y	OR
41	R8	CONFEDERATED TRIBES OF UMATILLA	Y	OR
41	R9	CONFEDERATED TRIBES OF WARM SPRINGS	Y	OR
41	US	EPA JURISDICTION	N	OR
41	WR	ODEQ - WESTERN REGIONAL OFFICE	N	OR
41	00	STATE JURISDICTION	N	OR
41	08	LANE REGIONAL AIR POLLUTION AUTHORITY	N	OR
42	00	STATE JURISDICTION	N	PA
42	01	ALLEGHENY COUNTY HEALTH DEPARTMENT	N	PA
42	02	PHILADELPHIA AIR MANAGEMENT SERVICES	N	PA
44	00	STATE JURISDICTION	N	RI
45	00	STATE JURISDICTION	N	SC
46	00	STATE JURISDICTION	N	SD
46	73	ASSINBOINE & SIOUX TRIBES	Y	SD
46	75	CHEYENNE RIVER SIOUX TRIBE	Y	SD
46	79	CROW CREEK SIOUX TRIBE	Y	SD
46	81	FLANDREAU SANTEE SIOUX TRIBE	Y	SD
46	83	LOWER BRULE SIOUX TRIBE	Y	SD
46	87	OGLALA SIOUX TRIBE	Y	SD
46	89	ROSEBUD SIOUX TRIBE	Y	SD
46	90	SISSETON-WAHPETON OYATE	Y	SD
46	99	YANKTON SIOUX TRIBE	Y	SD
47	00	STATE JURISDICTION	N	TN
47	01	NASHVILLE-DAVIDSON COUNTY	N	TN
47	02	MEMPHIS-SHELBY COUNTY	N	TN
47	03	CHATTANOOGA-HAMILTON COUNTY	N	TN

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
47	04	KNOX COUNTY	N	TN
48	00	STATE JURISDICTION	N	TX
48	01	REGION 1, AMARILLO	N	TX
48	02	REGION 2, LUBBOCK	N	TX
48	03	REGION 3, ABILENE	N	TX
48	04	REGION 4, DALLAS/FT WORTH	N	TX
48	05	REGION 5, TYLER	N	TX
48	06	REGION 6, EL PASO	N	TX
48	07	REGION 7, MIDLAND	N	TX
48	08	REGION 8, SAN ANGELO	N	TX
48	09	REGION 9, WACO	N	TX
48	10	REGION 10, BEAUMONT	N	TX
48	11	REGION 11, AUSTIN	N	TX
48	12	REGION 12, HOUSTON	N	TX
48	13	REGION 13, SAN ANTONIO	N	TX
48	14	REGION 14, CORPUS CHRISTI	N	TX
48	15	REGION 15, HARLINGEN	N	TX
48	16	REGION 16, LAREDO	N	TX
49	00	STATE JURISDICTION	N	UT
49	86	NORTHWESTERN BAND OF SHOSHONI NATION	Y	UT
49	88	PAIUTE INDIAN TRIBE OF UTAH	Y	UT
49	91	SKULL VALLEY BAND OF GOSHUTE INDIANS	Y	UT
49	97	UTE INDIAN TRIBE	Y	UT
49	98	NAVAJO NATION	Y	UT
50	00	STATE JURISDICTION	N	VT
51	00	STATE JURISDICTION	N	VA
53	US	EPA JURISDICTION	N	WA
53	00	STATE JURISDICTION	N	WA
53	01	PUGET SOUND CLEAN AIR AGENCY	N	WA
53	02	OLYMPIC REGIONAL CLEAN AIR AGENCY	N	WA
53	03	NORTHWEST CLEAN AIR AGENCY	N	WA
53	04	SOUTHWEST CLEAN AIR AUTHORITY	N	WA
53	05	YAKIMA REGIONAL CLEAN AIR AUTHORITY	N	WA
53	06	BENTON CLEAN AIR AUTHORITY	N	WA
53	07	SPOKANE COUNTY AIR POLLUTION CONTROL AUTHORITY	N	WA
53	09	DEPT OF ECOLOGY - CENTRAL REGIONAL OFFICE (CRO)	N	WA
53	10	DEPT OF ECOLOGY - INDUSTRIAL SECTION	N	WA
53	11	DEPT OF ECOLOGY - SOUTHWEST REGIONAL OFFICE (SRO)	N	WA
53	12	DEPT OF ECOLOGY - NUCLEAR WASTE SECTION	N	WA
53	13	DEPT OF ECOLOGY - NORTHWEST REGIONAL OFFICE (NRO)	N	WA
53	14	DEPT OF ECOLOGY - EASTERN REGIONAL OFFICE (ERO)	N	WA
53	30	CONFEDERATED TRIBES OF CHEHALIS	Y	WA
53	31	CONFEDERATED TRIBES OF COLVILLE	Y	WA
53	32	COWLITZ INDIAN TRIBE	Y	WA
53	33	HOH INDIAN TRIBE	Y	WA
53	34	JAMESTOWN S'KLALLAM TRIBE	Y	WA
53	35	KALISPEL TRIBE OF INDIANS	Y	WA
53	36	LOWER ELWHA TRIBAL COUNCIL	Y	WA
53	37	LUMMI INDIAN NATION	Y	WA
53	38	MAKAH INDIAN TRIBE	Y	WA
53	39	MUCKLESHOOT INDIAN TRIBE	Y	WA

ST FIP	LCON	DESCRIPTION	TRIBAL	ST ABBR
53	40	NISQUALLY INDIAN TRIBE	Y	WA
53	41	NOOKSACK INDIAN TRIBE	Y	WA
53	42	PORT GAMBLE S'KLALLAM TRIBE	Y	WA
53	43	PUYALLUP TRIBE OF INDIANS	Y	WA
53	44	QUILEUTE INDIAN TRIBE	Y	WA
53	45	QUINAULT INDIAN NATION	Y	WA
53	46	SAMISH INDIAN NATION	Y	WA
53	47	SAUK-SUIATTLE INDIAN TRIBE	Y	WA
53	48	SHOAL WATER BAY INDIAN TRIBE	Y	WA
53	49	SKOKOMISH INDIAN NATION	Y	WA
53	50	SNOQUALMIE TRIBE	Y	WA
53	51	SPOKANE TRIBE OF INDIANS	Y	WA
53	52	SQUAXIN ISLAND TRIBE	Y	WA
53	53	STILLAGUAMISH TRIBE	Y	WA
53	54	SUQUAMISH INDIAN TRIBE	Y	WA
53	55	SWINOMISH INDIAN TRIBE	Y	WA
53	56	TULALIP TRIBES OF WASHINGTON	Y	WA
53	57	UPPER SKAGIT INDIAN TRIBE	Y	WA
53	58	YAKAMA NATION	Y	WA
54	00	STATE JURISDICTION	N	WV
55	00	STATE JURISDICTION	N	WI
55	01	BAD RIVER BAND OF LAKE SUPERIOR CHIPPEWA	Y	WI
55	02	FOREST COUNTY POTAWATOMI COMMUNITY	Y	WI
55	03	HO-CHUNK NATION	Y	WI
55	04	LAC COURTE OREILLES BAND OF CHIPPEWA	Y	WI
55	05	LAC DU FLAMBEAU BAND OF CHIPPEWA	Y	WI
55	06	MENOMINEE INDIAN TRIBE OF WISCONSIN	Y	WI
55	07	ONEIDA TRIBE OF WISCONSIN	Y	WI
55	08	RED CLIFF BAND OF LAKE SUPERIOR CHIPPEWA	Y	WI
55	09	ST. CROIX CHIPPEWA TRIBE OF WISCONSIN	Y	WI
55	10	SOKAOGON CHIPPEWA COMMUNITY	Y	WI
55	11	STOCKBRIDGE-MUNSEE COMMUNITY	Y	WI
56	00	STATE JURISDICTION	N	WY
56	80	EASTERN SHOSHONE TRIBE	Y	WY
56	85	NORTHERN ARAPAHO TRIBE	Y	WY
60	00	AMERICAN SAMOA (NO REPORTABLE SOURCES) (NON-GRANTEE)	Y	AS
60	99	EPA REGION 9'S SPECIAL JURISDICTION	N	AS
66	00	GUAM EPA (NO SOURCES TO REPORT)_(GRANTEE)	N	GU
66	99	EPA REGION 9'S SPECIAL JURISDICTION	N	GU
69	00	MARIANNAS PROTECTORATE-CONFEDERATION OFNORTHERN MARIANAS ISLANDS-NONGRANTEE	N	MP
69	99	EPA REGION 9'S SPECIAL JURISDICTION	N	MP
72	00	STATE JURISDICTION	N	PR
78	00	STATE JURISDICTION	N	VI

Appendix 5

Air Subpart Tables for New Source Performance Standards (NSPS) and Most Achievable Control Technology (MACT)

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NSPS (PART 60) SUBPARTS
Mar-09

SUBP	NSPS (PART 60) SUBPARTS
A	GENERAL PROVISIONS
AA	ELEC-ARC STEEL FURNACE 10/21/74-8/17/83
AA/A	EL-ARC FRN, ARGON-O2 DECARB VESSEL AFTER 8/7/83
AAA	NEW RESIDENTIAL WOOD HEATERS
AAAA	SMALL MUNICIPAL WASTE COMBUST UNITS CONSTR AFTER 19990830
B	STATE PLANS FOR DESIGNATED FACILITIES
BB	KRAFT PULP MILLS
BBB	RUBBER TIRE MANUFACTURE
BBBB	EXISTING SMALL MUNICIPAL WASTE COMBUSTION (MWC) UNITS
C	EMISSION GUIDELINES AND COMPLIANCE TIMES
C/B	LARGE MWC CONSTRUCTED ON OR BEFORE SEPT. 20, 1994
C/C	MUNICIPAL SOLID WASTE LANDFILLS
C/D	EM GUIDELINES AND COMP TIMES FOR SULFURIC ACID PLANTS
CC	GLASS MANUFACTURING PLANT
CCCC	COMMERCIAL & INDUSTRIAL SOLID WASTE INCINERATORS CONSTRUCTED
CE	EXISTING HOSPITAL/MEDICAL/INFECTIOUS WASTE INCINERATORS
D	FOSSIL FUEL GENER BUILT AFTER 8/17/71
DA	ELEC UTIL STEAM GENER AFTER 9/18/78
DB	INDUS-COMMERC-INSTITUTL STEAM GENERATOR
DC	SMALL INDUS-COMMER-INSTITUTL STEAM GENER
DD	GRAIN ELEVATORS
DDD	VOC EMISS FROM POLYMER MANUFACTURING
DDDD	GUIDE/TIMES-COMMER/IND SOLID WASTE INCIN CONSTRUC =>11/30/99
E	INCINERATORS
E/B	LARGE MWC CONSTR AFTER 19940920
EA	MUNICIPAL WASTE COMBUSTORS
EC	NEW HOSPITAL/MEDICAL/INFECTIOUS WASTE INCINERATORS
EE	SURFAC COATING OF METAL FURNITURE
EEEE	OTHER SOLID WASTE INCIN UNITS CONSTR AFTER 20041209
F	PORTLAND CEMENT PLANTS
FFF	FLEXIBLE VINYL/URETHANE COATING/PRINTING
FFFF	OTHER SOLID WASTE INCIN UNITS CONSTR AFTER 20041209
G	NITRIC ACID PLANTS
GG	STATIONARY GAS TURBINES
GGG	EQUIP VOC LEAKS PETROLEUM REFINERIES
GGG/A	EQUIP LEAKS OF VOC IN PETROL REFIN CONSTR AFTER 20061107
H	SULFURIC ACID PLANTS
HH	LIME MANUFACTURING PLANTS
HHH	SYNTHETIC FIBER PRODUCTION FACILITIES
HHHH	COAL-FIRED ELECTRIC STEAM GENERATING UNITS
I	HOT MIX ASPHALT FACILITIES
III	VOC EMISS OF SOCMI AIR-O2 UNIT PROCESS
IIII	DIESEL ENGINES COMPRESSION COMBUSTION ENGINES
J	PETROLEUM REFINERIES
J/A	PETROLEUM REFINERIES AFTER MAY 14, 2007
JJJ	PETROLEUM DRY CLEANERS
JJJJ	STATIONARY SPARK IGNITION COMBUSTION ENGINES

SUBP	NSPS (PART 60) SUBPARTS
K	PETROLEUM STORAGE VESSEL 6/11/73 5/19/78
KA	PETROLEUM STORAGE VESSEL 5/19/73 7/23/84
KB	VOLATILE LIQ/PETRO STORAGE VESSEL 7/23/84
KK	LEAD-ACID BATTERY MANUFACTURING PLANTS
KKK	VOC EMISS, ONSHORE NATURAL GAS PROC PLNT
KKKK	STATIONARY COMBUSTION TURBINES
L	SECONDARY LEAD SMELTERS
LL	METALLIC MINERAL PROCESSING PLANTS
LLL	SO2 EMISS, ONSHORE NATURAL GAS PROC PLNT
M	SECONDARY BRASS & BRONZE PRODUCTN PLANTS
MM	AUTO/LT-DUTY TRK SURFACE COATING OPERATN
N	PRIMARY EMISS BASIC O2 PROCESS FURNACES
NA	SECNDRY EMISS BASIC O2-PROC STEEL FACIL
NN	PHOSPHATE ROCK PLANTS
NNN	VOC EMISS OF SOCMI DISTILLATION OPERATN
O	SEWAGE TREATMENT PLANTS
OOO	NONMETALLIC MINERAL PROCESSING PLANTS
P	PRIMARY COPPER SMELTERS
PP	AMMONIUM SULFATE MANUFAC
PPP	WOOL FIBERGLASS INSULATION PRODUCTION - NSPS
Q	PRIMARY ZINC SMELTERS
QQ	GRAPH ART: PUBLICATION ROTOGRAVURE PRINT
QQQ	VOC EMISS PETRO REFINERY WATERWASTE SYS
R	PRIMARY LEAD SMELTERS
RR	PRESSR-SENST TAPE, LABEL SURFACE COATING
RRR	SOCMI REACTOR
S	PRIMARY ALUMINUM REDUCTION PLANTS
SS	LARGE APPLIANCES
SSS	MAGNETIC TAPE COATING
T	PHOSPHATE FRTLZR: WET-PROC PHOSPH ACID
TT	METAL COIL SURFACE COATING
TTT	IND-SURF-COAT: PLASTICS, BUSINESS MACHNS
U	PHOSPHATE FRTLZR: SUPERPHOSPHORIC ACID
UU	ASPHALT PROCESSING & ROOFING MANUFACTURE
UUU	CALCINERS/DRYERS IN MINERAL INDUSTRIES
V	PHOSPHATE FRTLZR: DIAMMONIUM PHOS PLANT
VV	EQUIPT VOC LEAKS IN SYNTH-ORGAN-CHEM MFG
VV/A	SOCMI EQUIPMENT LEAKS OF VOC CONSTR AFTER 20061107
VVV	POLYMERIC COATING OF SUPPORTING SUBSTRATS FACILITIES - NSPS
W	PHOSPHATE FRTLZR: TRIPLE SUPERPHOS PLNT
WW	BEVERAGE CAN SURFACE COATING
WWW	MUNICIPAL SOLID WASTE LANDFILLS
X	PHOSPHATE FRTLZR: GRANULAR 3-SUPER STOR
XX	BULK GASOLINE TERMINALS
Y	COAL PREPARATION PLANTS
Z	FERROALLOY PRODUCTION FACILITIES

NESHAPS NONMACT (PART 61) SUBPARTS
Mar-09

SUBP	NESHAPS NONMACT (PART 61) DESCRIPTION
A	GENERAL PROVISIONS
B	RADON FROM UNDERGROUND URANIUM MINES
BB	BENZENE EMISS FROM BENZENE TRANSFR OPER
C	BERYLLIUM
D	BERYLLIUM ROCKET MOTOR FIRING
E	MERCURY
F	VINYL CHLORIDE
FF	BENZENE WASTE OPERATIONS
H	RADIONUCS OTR THN RADON FROM DPT OF ENGY
I	RADIONUCS NRC LICNSD OR FEDRL, NOT SUB-H
J	EQUIP LEAK (FUGITIVE EMISS SRC) BENZENE
K	RADIONUCS FROM ELEMENTAL PHOSPHORUS PLNT
L	BENZENE FROM COKE BY-PRODUCT RECOVERY
M	ASBESTOS
N	INORGANIC ARSENIC, FROM GLASS MANUFACT
O	INORG ARSENIC FROM PRIMARY COPPER SMLTR
P	INORG ARSENIC, ARS TRIOXIDE, METAL ARS
Q	RADON FROM DOE FACILITIES
R	RADON FROM PHOSPHOGYMSUM STACKS
T	RADON, DISPOSAL OF URANIUM MILL TAILINGS
V	EQUIPMENT LEAKS (FUGITIVE EMISSIONS SRC)
W	RADON FROM OPERATING MILL TAILINGS
Y	BENZENE EMISS FROM BNZN STORAGE VESSELS

NESHAPS MACT (PART 63) SUBPARTS
Mar-09

SUBP	NESHAPS MACT (PART 63) DESCRIPTION
A	GENERAL PROVISIONS
AA	PHOSPERIC ACID MANUFACTURING PLANTS
AAAA	MUNICIPAL SOLID WASTE LANDFILLS
AAAAA	LIME MANUFACTURING
B	REQ FOR CONTROL TECHNOLOGY DETERMINATIONS FOR MAJOR SOURCES
BB	PHOSPHATE FERTILIZERS
BBBBB	SEMICONDUCTOR MANUFACTURING
C	DELISTINGS OF HAPS
CC	PETROLEUM REFINERIES
CCC	STEEL PICKLING-HCI PROCESS FACILITIES AND HCI REG PLANTS
CCCC	MANUFACTURING OF NUTRITIONAL YEAST
CCCCC	COKE OVENS: PUSHING, QUENCHING AND BATTERY STACKS
D	COMPLIANCE EXTENSION, EARLY HAP REDUCTN
DD	OFF-SITE WASTE AND RECOVERY OPERATIONS
DDD	MINERAL WOOL PRODUCTION
DDDD	PLYWOOD AND COMPOSITE WOOD PRODUCTS
DDDDD	INDUSTRIAL/COMMERCIAL/INSTITUTIONAL BOILERS & PROCESS HEATER
E	APPROVAL OF STATE PROGRAMS & DELEGATION OF AUTHORITY
EE	MAGNETIC TAPE MFG. OPERATIONS
EEE	ALL HAZARDOUS WASTE INCINERATORS
EEEE	ORGANIC LIQUIDS DISTRIBUTION (NON-GASOLINE)
EEEEE	IRON AND STEEL FOUNDRIES
F	SYNTHETIC HAZARDOUS ORGANICS (SOCMI) STANDARDS
FFFF	MISCELLANEOUS ORGANIC CHEMICAL MANUFACTURING (MON)
FFFFF	INTEGRATED IRON AND STEEL MANUFACTURING
G	STORAGE OF HAZARDOUS ORGANICS
GG	AEROSPACE MFG. & REWORK
GGG	PHARMACEUTICAL MANUFACTURING
GGGG	SOLVENT VEGETABLE OIL EXTRACTION
GGGGG	SITE REMEDIATION
H	EQUIPMENT LEAKS OF HAZARDOUS ORGANICS
HH	OIL AND NATURAL GAS PRODUCTION FACILITIES
HHH	NATURAL GAS TRANSMISSION & STORAGE FACILITIES
HHHH	WET FORMED FIBERGLASS MAT PRODUCTION
HHHHH	MISCELLANEOUS COATING MANUFACTURING FACILITIES
I	NEGOTIATED REGS: EQUIP LEAKS, HAZ-ORGNCS
II	SHIPBUILDING & SHIP REPAIR
III	FLEXIBLE POLYURETHANE FOAM PRODUCTION
IIII	SURFACE COATING OF AUTO AND LIGHT DUTY TRUCKS
IIIII	MERCURY CELL CHLOR-ALKALI PLANTS
J	POLYVINYL CHLORIDE AND COPOLYMERS PRODUCTION
JJ	WOOD FURNITURE
JJJ	GROUP IV POLYMERS AND RESINS
JJJJ	NESHAP FOR PAPER & OTHER WEB SURFACE COATINGS
JJJJJ	BRICK & STRUCTURAL CLAY PRODUCTS
KK	PRINTING & PUBLISHING
KKKK	METAL CAN (SURFACE COATING)

SUBP	NESHAPS MACT (PART 63) DESCRIPTION
KKKKK	CLAY CERAMICS MANUFACTURING
L	COKE OVEN BATTERIES
LL	PRIMARY ALUMINUM REDUCTION PLANTS
LLL	PORTLAND CEMENT PLANTS
LLLLL	ASPHALT PROCESSING AND ASPHALT ROOFING MANUFACTURING
M	DRY CLEANERS PERCHLOROETHYLENE
MM	PULP MILL CHEMICAL RECOVERY BOILER
MMM	PESTICIDE ACTIVE INGREDIENT PRODUCTION
MMMM	MISC. METAL PARTS AND PRODUCTS SURFACE COATING OPERATIONS
MMMMM	FLEXIBLE POLYURETHANE FOAM FABRICATION OPERATIONS
N	CHROMIUM ELECTROPLATING
NNN	WOOL FIBERGLASS MANUFACTURING
NNNN	SURFACE COATING OF LARGE APPLIANCES
NNNNN	HYDROCHLORIC ACID PRODUCTION FUMED SILICA PRODUCTION
O	ETHYLENE OXIDE STERILIZERS
OO	OFF-SITE WASTE AND RECOVERY OPERATIONS - TANK STANDARDS
OOO	MANUFACTURE OF AMINO/PHENOLIC RESINS 40 CFR 63.1419
OOOO	PRINTING, COATING AND DYEING OF FABRICS AND OTHER TEXTILES
PP	OFF-SITE WASTE AND RECOVERY OPERATIONS - CONTAINER STANDARDS
PPP	POLYETHER POLYOLS PRODUCTION - MACT NESHAP
PPPP	PLASTIC PARTS (SURFACE COATING)
PPPPP	ENGINE TEST CELLS/STANDS
Q	INDUSTRIAL PROCESS COOLING TOWERS
QQ	OFF-SITE WASTE AND RECOVERY OPERATIONS - SURFACE IMPOUNDMENT
QQQ	PRIMARY COPPER
QQQQ	SURFACE COATING OF WOOD BUILDING PRODUCTS
QQQQQ	FRICTION MATERIALS MANUFACTURING FACILITIES
R	GASOLINE DISTRIBUTION
RR	OFF-SITE WASTE AND RECOVERY OPERATIONS - INDIVIDUAL DRAIN SY
RRR	SECONDARY ALUMINUM PRODUCTION
RRRR	SURFACE COATING OF METAL FURNITURE
RRRRR	TACONITE IRON ORE PRODUCTION
S	PULP AND PAPER
SS	NATL EMISS STD- CLOSED VENT SYS/CTRL DEVICES, 40 CFR 63.980
SSSS	METAL COIL
SSSSS	REFRACTORY PRODUCTS MANUFACTURING
T	HALOGENATED SOLVENT CLEANING
TT	EQUIPMENT LEAKS - CONTROL LEVEL 1
TTT	PRIMARY LEAD SMELTERS
TTTT	LEATHER FINISHING OPERATIONS
TTTTT	PRIMARY MAGNESIUM
U	ELASTOMERS & SYNTHETIC RUBBER PRODUCTION (POLYMERS/RESINS G1
UU	NTL EMISS. STD FOR EQUIP LEAKS-CONTROL 2 STD, 40 CFR 63.1019
UUU	NESHAP FOR PETROLEUM REFINERIES: CCU'S, CRU'S & SRU'S
UUUU	CELLULOSE PRODUCT MANUFACTURING
VV	OFF-SITE WASTE & RECOVERY - OIL-WATER & ORGANIC-WATER SEPARA
VVV	PUBLICLY OWNED TREATMENT WORKS - MACT NESHAP
VVVV	NEW AND EXISTING BOAT MANUFACTURING FACILITIES
W	EPOXY RESINS & NON-NYLON POLYAMIDES PRODUCTION
WW	NATL EMIS STD - STORAGE VESSELS (TANKS), 40 CFR 63.1060

SUBP	NESHAPS MACT (PART 63) DESCRIPTION
WWWW	REINFORCED PLASTIC COMPOSITES PRODUCTION
WWWWW	HOSPITAL ETHYLENE OXIDE STERILIZERS
X	SECONDARY LEAD SMELTERS
XX	ETHYLENE MPF: HEAT EXCHANGE SYSTEMS & WASTE OPERATIONS
XXX	FERROALLOY PRODUCTION
XXXX	RUBBER TIRE MANUFACTURING
Y	MARINE TANK VESSEL LOADING & UNLOADING OPERATIONS
YY	GENERIC MACT STANDARDS
YYYY	STATIONARY COMBUSTION TURBINES
YYYYY	ELECTRIC ARC FURNACE STEELMAKING AREA SOURCES
ZZZZ	RECIPROCATING INTERNAL COMBUSTION ENGINES (RICE)
ZZZZZ	IRON AND STEEL FOUNDRIES AREA SOURCES
6B	GASOLINE DISTRIBUTION BULK TERMINALS
6C	GASOLINE DISPENSING FACILITIES- AREA SOURCES
6D	POLYVINYL CHLORIDE AND COPOLYMERS PRODUCTION AREA SOURCES
6E	PRIMARY COPPER SMELTING AREA SOURCES
6F	SECONDARY COPPER SMELTING AREA SOURCES
6G	PRIMARY NONFERROUS METALS, ZN, CD AND BE AREA SOURCES
6H	PAINT STRIP & MISC SURFACE COATING OPERATIONS AREA SOURCES
6L	ACRYLIC AND MODACRYLIC FIBERS PRODUCTION AREA SOURCES
6M	CARBON BLACK PRODUCTION AREA SOURCES
6N	CHEMICAL MANUFACTURING AREA SOURCES
6O	FLEXIBLE POLYURETHANE FOAM PROD & FAB AREA SOURCES
6P	LEAD ACID BATTERY MANUFACTURING AREA SOURCES
6Q	WOOD PERSERVING AREA SOURCES
6R	CLAY CERAMICS MFG AREA SOURCES
6S	GLASS MFG AREA SOURCES
6T	SECONDARY NONFERROUS METALS AREA SOURCES
6W	PLATING AND POLISHING OPERATIONS
6X	NINE METAL FABRICATION AND FINISHING SOURCE CATEGORIES

Appendix 6

AFS Security

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Enforcement and Compliance Assurance
Office of Compliance
1200 Pennsylvania Avenue NW
Washington, DC 20460

MEMORANDUM

SUBJECT: Welcome to AFS!
TO: The Newest AFS User
FROM: Akachi Imegwu, *AFS Security Manager*

We have processed your new user profile and you will now be able to start using the largest (and *oldest*) air enforcement and compliance database in the Nation!

This informational material was developed to outline briefly the security measures for the Air Facility System (AFS), explain why these measures were developed, and to establish the requirement for compliance. It also serves as a reference for useful links to information and contacts. The following topics will be covered in this memo:

I. EPA's Security Measures for AFS
II. AFS Application Guidelines for All Users
III. Guidelines for Handling Enforcement - Sensitive Data
IV. Protecting Your Password
V. Logging in for the First Time
VI. Training Movie on the Web: AFS Rules of Behavior
VII. Summary Remarks
VIII. Useful Links and Contacts

I. EPA's SECURITY MEASURES FOR AFS

The security measures for AFS are intended to protect the air compliance data that State and local agencies periodically submit to EPA. This protection includes measures to protect against unauthorized modification or loss of data, while at the same time protecting the underlying computer system that EPA operates.

AFS is an ADABAS database management system located on EPA's National Computer Center (NCC) mainframe. As such, AFS follows the security procedures set forth by the NCC which primarily involves the use of User Accounts, User IDs, passwords and ADABAS/Natural Security. Briefly, these procedures require:

- Any individual wanting to access data in the AFS database must have authorization to use a mainframe account and obtain an NCC User ID. The ID and a secure password (determined by the User) must be used when accessing the NCC mainframe and the AFS data base. State and local agency Users are given limited update authority (i.e., they may only add or modify data for their particular agency).
- A User ID is only assigned to an individual (rather than an agency) and only to an individual that is recommended for access by the State or local agency (in writing) and approved by the appropriate EPA Regional Office AFS contact and Regional RACF Administrator.

Individuals granted User IDs have a responsibility to use them in an appropriate manner at all times and ensure that the access they have been personally granted is not shared with others (either deliberately or inadvertently).

II. AFS APPLICATION GUIDELINES FOR ALL USERS

AFS supports EPA, as well as State and local agencies, needing information to carry out air compliance management programs. All AFS users must ensure that the AFS application and its data are protected from loss, misuse, and unauthorized access or modification.

There are certain security practices and procedures that should be followed to minimize the potential misuse or damage to the AFS database. Some of these include:

- *Be familiar with the security policies and practices* involving the AFS application, especially those for confidential or sensitive information.
- *Maintain security for the application* by correctly using established security mechanisms (use of unique user ID and password) and practices when accessing the AFS application.
- *Do not attempt to view, change, or delete data* unless you are authorized to do so.
- Do not use *your system privileges to obtain data/files or run applications for anyone* who is not authorized to view or use data that are sensitive.
- *Be alert* to potential threats to corrupt or destroy the AFS application and database.
- Ensure that *no one person has sole access* to, or control over, AFS information and processing resources.
- *Guard user ID and password.* Do not loan out to others.

III. GUIDELINES FOR HANDLING ENFORCEMENT-SENSITIVE DATA

It is paramount that any sensitive information (e.g., enforcement, compliance) in the AFS application is protected from unauthorized access. Keep in mind the following:

- Be sure to *provide only authorized personnel with sensitive data* (whether the data are on your screen, on paper or in an electronic file).
- When viewing or processing confidential or sensitive data, *be sure the PC is in a non-traffic area and that only persons authorized to see the data* are in the area.
- *Protect all documents, reports and files containing sensitive data.* Be sure that they are labeled "ENFORCEMENT-SENSITIVE."
- *Destroy sensitive documents* by shredding when finished with them.
- *Safeguard* sensitive data. Do not store to your hard drive, safeguard your diskettes.
- Log off your computer when you are away from your work station!
- Lock up or put away sensitive data.

IV. PROTECTING YOUR PASSWORD

Review the following tips for protecting your password:

- Control access to your PC. Log out whenever you leave your machine.
- Change your application password every 90 days. Use at least 8 alphanumeric characters in your application password.
- Do not use family names, birthdays, sports teams' names, or words that can be found in the dictionary.
- Do not use consecutive keys on a keyboard or all the same character.
- Use new passwords. Do not use the last 8 versions of your password.
- If you believe your password has been compromised, change it immediately.
- Memorize your password rather than writing it down somewhere.

Notify the AFS System Administrator (Betsy Metcalf 202-564-5962) or AFS Security Manager (Akachi Imegwu 202-564-0045) immediately of security incidents. Notify your Regional AFS Compliance Manager when you no longer need access to the application.

V. LOGGING IN FOR THE FIRST TIME

This initial log in may require extra time to understand the various information displays. However, once you have successfully logged in, you may find it useful to keep in mind the following in reference to your JCL (Java Control Language) default:

ACCOUNT	: _____
FIMAS	: _____
TIME (MMMM)	: _____
TIME (SS)	: ____
PRIORITY CODE	: ____
MSGCLASS	: _____
NUMBER OF COPIES	: _____
FORM NUMBER	: _____
ROOM/BIN NUMBER	: _____
HOLD OUTPUT? (Y/N)	: ___
PRINTER SITE ID	: _____

Account Code: This is your NCC account code (Ex: AIR3, YNYA, etc)
FIMAS ID: use "AFSCP"
Time: Enter 6:40 for six minutes and 40 seconds
Priority: Use '1' unless approved by your Regional AFS Compliance Manager to use a different priority code.
2 (Prime time; 7:00am – 7:00pm Mon-Fri)
1 (Overnight; 7:00pm – 7:00am Mon – Fri)
0 (Weekend; Fri. 7:00pm – Mon 7:00am)
MSGCLASS: This is usually "A"
Number of Copies: "1"
Form Number: This is usually blank
Room/Bin Number: Take your User ID and put an 'M' in front of it. Ex: MIAJ, MKGQ, etc
Hold Output: "Y"
Printer Site ID: enter 'HOLD' or 'R255'

Please call your AFS Compliance Manager if you need assistance with your initial log in!

VI. TRAINING MOVIE ON THE WEB: AFS RULES OF BEHAVIOR

Recently we have launched an AFS training course through the National Enforcement Training Institute (NETI) web portal which will allow you to watch a training film online explaining these rules. Please see below for viewing instructions.

Instructions for Viewing AFS Rules of Behavior Training Film

*Please keep in mind the following as you prepare to view the courses 1) The training movie is best viewed if your desktop resolution is set to **1280 x 1024** pixels; 2) The courses have a sound component to them and you will need to adjust the volume depending on your surroundings.*

1. Go to www.netionline.com and logon with your account/password. If you don't have a NETI account and password, click the *New User Registration* link, complete the necessary information, and submit. You will receive a response promptly.
2. After logging in, select the *Schedule* link under the "Quick Links" heading in the upper left of the website.
3. Find the **AFS 901: Air Facility System (AFS) Training** course under the "Web Based Courses" heading towards the bottom of the page.
4. Select the *Register* link. You will receive a confirmation message upon completion of registration.
5. After confirmation, go to the *Classroom* link under the "Menu" heading on the left.
6. Find the **AFS 901: Air Facility System (AFS) Training** under the "My Classrooms" heading.

7. Select the *Enter Classroom* link.
8. Select the *Launch the Online Course* link under the "Course Activities" heading.
9. Select the *AFS Rules of Behavior* course from the "AFS Training Movie Main Menu" heading. The course will launch in a separate window.

Your opinion is important to us! After viewing the film(s) please provide your comments and suggestions.

VII. SUMMARY REMARKS

This information was compiled to assure that the contents and integrity of AFS data will be secure. In order to maintain security for the data provided in AFS, we suggest that the guidelines above be followed. The security measures that have been established are designed to protect the data that State and local agencies submit, while at the same time protecting the computer systems that EPA operates.

Any questions concerning the above information should be referred to Akachi Imegwu, AFS Security Manager, at (202) 564-0045.

VIII. USEFUL LINKS AND CONTACTS

CONTACTS

Your Regional AFS Compliance Managers will be your main point of contact for information on AFS.

EPA REGION	CONTACT NAME	PHONE
1	Beth Kudarauskas	617 918-1564
2	Steve Carrea	212-637-3498
2	Phillip Ritz	212-637-4064
3	Louvinia Madison-Glenn	215-814-5704
4	Ahmed Amanulah	404-562-9209
5	Lisa Holscher	312-866-6818
6	Pam Elder-Schweers	214-665-7463
7	Joe (Hugh) McCullough	913-551-7191
8	Jocelyn Hoffman	303-312-6232
8	Jeffrey Mosal	303-312-6802
9	Linda Barajas-Porter	415-947-4131
9	John Borton	415-972-3985
10	Laurie Kral	206-553-1868

Also keep note of the AFS Help Line, which is available Mon – Fri from 8:15am to 5:00pm Eastern time for questions concerning connectivity, data entry or data extraction at 1-800-367-1044.

The NCC Support Line is available for further technical assistance at: 1-866-411-4372.

DOCUMENTATION

Navigate to the AFS web site at: http://www.epa.gov/compliance/data/systems/air/afssystem.html for the following documents:

AFS Business Rules

AFS Data Dictionary
Universal Interface
A comprehensive listing of national and regional action types
News on Upcoming Events
Clean Air Act Enforcement
and more!

The following additional websites may prove useful in your search for information:

Enforcement and Compliance History Online (ECHO): http://www.epa.gov/echo/
Online Targeting Information System (OTIS): http://www.epa.gov/idea/otis/
EPA's Enforcement and Compliance Assurance: http://www.epa.gov/compliance/index.html
EPA's central Facility Registry System (FRS): http://www.epa.gov/enviro/html/fii/fii_query_java.html
TRC website (EPA Contractor) https://pops.trcsolutions.com/pops (login id=afsuser, password=airs, domain=client)

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Appendix 7

Acronyms Used in this Document

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Acronyms used in this Document

Note: Items listed in italicized, bold print are acronyms specific to the Air Facility System (AFS)

A

AFS: Air Facility System
APC1: Air program Code
APO: Administrative Penalty Order
ASPN: Permit Number
AST1: Air Program Operating Status

B – C

CAA: Clean Air Act
CAPP: Chemical Abstract Service Number
CASN: Chemical Abstract Service Number
CCB: Configuration Control Board
CEM: Continuous Emission Monitor
CFC: Chlorofluorocarbons
CMS: Compliance Monitoring Strategy
CNTY: County Code
COFA: Closeness of Fit Analysis
CMSC: Compliance Monitoring Strategy Category
CMSI: Compliance Monitoring Strategy Frequency Indicator
CYNM: City Name

D – E

DADS: HPV Discovery Action Type description
DADT: HPV Discovery Date
DATP: HPV Discovery Action Type
DCL1: Default Plant Classification
DTA1: Date Achieved

F

FACIL: Facility
FCE: Full Compliance Evaluation
FESOP: Federally Enforceable State Operating Permit
FIP: Federal Information Procedures System
FRS: Facility Registry System
FTP: File Transfer Protocol

G

GOVT: Governmental Facility Code
GPRA: Government Results and Performance Act

H

HAP: Hazardous Air Pollutants
HPV: High Priority Violators

I

ICR: Information Collection Request
ICIS: Integrated Compliance Information System

J - M

LCON: Local Control Region
MACT: Maximum Achievable Control Technology
MDR: Minimum Data Requirements

N

NAAQS: National Ambient Air Quality Standards
NAICS: North American Industrial Classification System
NESHAP: National Emission Standard for Hazardous Air Pollutants
NOV: Notice of Violation
NSPS: New Source Performance Review
NSR: New Source Review

O

OAQPS: Office of Air Quality Planning Standards
OECA: Office of Enforcement and Compliance Assurance
OTIS: Online Targeting and Information System

P

PAM1: Penalty Amount
PATY: Permit Action Type
PCDS: CDS Plant ID
PCE: Partial Compliance Evaluation
PDEA: Permit Date Event Achieved
PLAP: Pollutant Code
PLC1: Pollutant Code
PMTC: Permit Category
PNME: Plant Name
PPDE: Permit Program Data Elements
PSD: Prevention of Significant Deterioration

Q - R

RATA: Relative Accuracy Test Audit
RD08: Regional Data Element 8 (aka RD81)
RD16: Regional Data Element 16
RD81: Regional Data Element 8
RECAP: Reporting for Enforcement and Compliance Assurance Priorities
RMRR: Routine Maintenance, Repair and Replacement
RSC1: Results Code

S

SATN: State Pollutant Attainment Indicator
SCAP: State Pollutant Compliance Status
SCLP: State Pollutant Classification Code
SCL1: State Classification Code
SCNC: SIC/NAICS
SCSC: State-County-Plant ID
SEP: Supplemental Environmental Project
SIC: Standard Industrial Classification
SIC1: Standard Industrial Classification Code
SIP: State Implementation Plan
SM: Synthetic Minor
SPT1: Subpart
STAB: State Abbreviation
STRS: State Registration Number
STRT: Street Address
STTE: State Code
SV: Significant Violator

T

T&A: Timely and Appropriate
TAR: Tribal Authorization Plan
TIP: Tribal Implementation Plan

U - Z

VTP1: Violation Type Code(s)
VPL1: Violating Pollutant(s)
ZIPC: Zip Code

Appendix 8

Change/Update Request Form

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CHANGE/UPDATE REQUEST FORM

DATE: _____

TO: EPA Regional AFS Compliance Manager

FROM: e _____Nam_____

Title _____

Agency _____

s Addres _____

_____

Phone _____

mail e _____

I would like to request the following change/update to the AFS Business Rules Compendium:
(please describe the change, include the appropriate page number, version of the document you are using, and appropriate section of the document for your changes/update/additions)

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Appendix 9

AFS Schedule of Monthly Utilities

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january 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
28 dec.	29	30	31	1 **Federal Holiday**	2 NIGHTLY BATCH CDE DEL OLD CDE	3 BATCH CLEANUP HPV CLEANUP
4	5 NIGHTLY BATCH CDE DEL OLD CDE	6 NIGHTLY BATCH CDE DEL OLD CDE	7 NIGHTLY BATCH CDE DEL OLD CDE	8 NIGHTLY BATCH CDE DEL OLD CDE	9 NIGHTLY BATCH CDE DEL OLD CDE	10 BATCH CLEANUP HPV CLEANUP
11	12 NIGHTLY BATCH CDE DEL OLD CDE	13 NIGHTLY BATCH CDE DEL OLD CDE	14 NIGHTLY BATCH CDE DEL OLD CDE Cmpl Mgr's call	15 NIGHTLY BATCH CDE DEL OLD CDE	16 NIGHTLY BATCH CDE DEL OLD CDE	17 BATCH CLEANUP HPV CLEANUP
18	19 **Federal Holiday** MLK HOLIDAY	20 NIGHTLY BATCH CDE DEL OLD CDE	21 NIGHTLY BATCH CDE DEL OLD CDE NATL AFS CALL	22 NIGHTLY BATCH CDE DEL OLD CDE	23 NIGHTLY BATCH CDE DEL OLD CDE	24 BATCH CLEANUP HPV CLEANUP
25	26 NIGHTLY BATCH CDE DEL OLD CDE	27 NIGHTLY BATCH CDE DEL OLD CDE	28 NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	29 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	30 NIGHTLY BATCH CDE DEL OLD CDE	31 BATCH CLEANUP HPV CLEANUP

notes:

NEW CMS FLAGS FOR FY09 SHOULD BE LOADED INTO AFS BY JANUARY 31, 2009

february 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1	2 NIGHTLY BATCH CDE DEL OLD CDE	3 NIGHTLY BATCH CDE DEL OLD CDE	4 NIGHTLY BATCH CDE DEL OLD CDE	5 NIGHTLY BATCH CDE DEL OLD CDE	6 NIGHTLY BATCH CDE DEL OLD CDE	7 BATCH CLEANUP HPV CLEANUP
8	9 NIGHTLY BATCH CDE DEL OLD CDE	10 NIGHTLY BATCH CDE DEL OLD CDE	11 NIGHTLY BATCH CDE DEL OLD CDE	12 NIGHTLY BATCH CDE DEL OLD CDE	13 NIGHTLY BATCH CDE DEL OLD CDE	14 BATCH CLEANUP HPV CLEANUP
15	16 **Federal Holiday** WASHINGTON'S BD	17 NIGHTLY BATCH CDE DEL OLD CDE	18 NIGHTLY BATCH CDE DEL OLD CDE	19 NIGHTLY BATCH CDE DEL OLD CDE	20 NIGHTLY BATCH CDE DEL OLD CDE	21 BATCH CLEANUP HPV CLEANUP
22	23 NIGHTLY BATCH CDE DEL OLD CDE	24 NIGHTLY BATCH CDE DEL OLD CDE	25 NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	26 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	27 NIGHTLY BATCH CDE DEL OLD CDE	28 BATCH CLEANUP HPV CLEANUP
1 mar.	2	3	4	5	6	7

notes:

march 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1	2 NIGHTLY BATCH CDE DEL OLD CDE	3 NIGHTLY BATCH CDE DEL OLD CDE	4 NIGHTLY BATCH CDE DEL OLD CDE	5 NIGHTLY BATCH CDE DEL OLD CDE	6 NIGHTLY BATCH CDE DEL OLD CDE	7 BATCH CLEANUP HPV CLEANUP
8	9 NIGHTLY BATCH CDE DEL OLD CDE	10 NIGHTLY BATCH CDE DEL OLD CDE	11 NIGHTLY BATCH CDE DEL OLD CDE	12 NIGHTLY BATCH CDE DEL OLD CDE	13 NIGHTLY BATCH CDE DEL OLD CDE	14 BATCH CLEANUP HPV CLEANUP
15	16 NIGHTLY BATCH CDE DEL OLD CDE	17 NIGHTLY BATCH CDE DEL OLD CDE AFS NATL WS	18 NIGHTLY BATCH CDE DEL OLD CDE AFS NATL WS	19 NIGHTLY BATCH CDE DEL OLD CDE AFS NATL WS	20 NIGHTLY BATCH CDE DEL OLD CDE	21 BATCH CLEANUP HPV CLEANUP
22	23 NIGHTLY BATCH CDE DEL OLD CDE	24 NIGHTLY BATCH CDE DEL OLD CDE	25 NIGHTLY BATCH CDE DEL OLD CDE	26 NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	27 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	28 BATCH CLEANUP HPV CLEANUP
29	30 NIGHTLY BATCH CDE DEL OLD CDE QTRLY COMPL	31 NIGHTLY BATCH CDE DEL OLD CDE FY09 2ND QTR	1 Apr.	2	3	4

notes:

april 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
29 mar.	30	31	1	2	3	4
			NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
			CDE	CDE	CDE	HPV CLEANUP
			DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
5	6	7	8	9	10	11
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
12	13	14	15	16	17	18
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
19	20	21	22	23	24	25
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
26	27	28	29	30	1 may	2
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH		
	CDE	CDE	CDE	CDE		
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE		
		UNK-GEN&UNGEN	COMPL HISTORY			

notes:

may 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
26 apr.	27	28	29	30	1	2
					NIGHTLY BATCH CDE DEL OLD CDE	BATCH CLEANUP HPV CLEANUP
3	4	5	6	7	8	9
	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	BATCH CLEANUP HPV CLEANUP
10	11	12	13	14	15	16
	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	BATCH CLEANUP HPV CLEANUP
17	18	19	20	21	22	23
	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE	BATCH CLEANUP HPV CLEANUP
24	25 **Federal Holiday** MEMORIAL DAY	26	27	28	29	30
		NIGHTLY BATCH CDE DEL OLD CDE	NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	NIGHTLY BATCH CDE DEL OLD CDE	BATCH CLEANUP HPV CLEANUP
31	1 Jun.	2	3	4	5	6

notes:

FY09 DATA (10/10/2008-03/31/2008) DUE INTO AFS BY 05/31/2008

june 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
31	1 NIGHTLY BATCH CDE DEL OLD CDE FY09 MID YEAR	2 NIGHTLY BATCH CDE DEL OLD CDE FY09 MID YEAR	3 NIGHTLY BATCH CDE DEL OLD CDE FY09 MID YEAR	4 NIGHTLY BATCH CDE DEL OLD CDE FY09 MID YEAR	5 NIGHTLY BATCH CDE DEL OLD CDE FY09 MID YEAR	6 BATCH CLEANUP HPV CLEANUP
7	8 NIGHTLY BATCH CDE DEL OLD CDE	9 NIGHTLY BATCH CDE DEL OLD CDE	10 NIGHTLY BATCH CDE DEL OLD CDE	11 NIGHTLY BATCH CDE DEL OLD CDE	12 NIGHTLY BATCH CDE DEL OLD CDE	13 BATCH CLEANUP HPV CLEANUP
14	15 NIGHTLY BATCH CDE DEL OLD CDE	16 NIGHTLY BATCH CDE DEL OLD CDE	17 NIGHTLY BATCH CDE DEL OLD CDE	18 NIGHTLY BATCH CDE DEL OLD CDE	19 NIGHTLY BATCH CDE DEL OLD CDE	20 BATCH CLEANUP HPV CLEANUP
21	22 NIGHTLY BATCH CDE DEL OLD CDE	23 NIGHTLY BATCH CDE DEL OLD CDE	24 NIGHTLY BATCH CDE DEL OLD CDE	25 NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	26 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	27 BATCH CLEANUP HPV CLEANUP
28	29 NIGHTLY BATCH CDE DEL OLD CDE QTRLY COMPL	30 NIGHTLY BATCH CDE DEL OLD CDE	1 jul.	2	3	4

notes:

july 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
28 jun.	29	30	1	2	3 **Federal Holiday**	4
			NIGHTLY BATCH	NIGHTLY BATCH		BATCH CLEANUP
			CDE	CDE		HPV CLEANUP
			DEL OLD CDE	DEL OLD CDE		
					INDEPENDENCE HOLIDAY	INDEPENDENCE DAY
5	6	7	8	9	10	11
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
12	13	14	15	16	17	18
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
19	20	21	22	23	24	25
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
26	27	28	29	30	31	1 aug.
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	
	CDE	CDE	CDE	CDE	CDE	
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
			UNK-GEN&UNGEN	COMPL HISTORY		

notes:

august 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
26 jul.	27	28	29	30	31	1 BATCH CLEANUP HPV CLEANUP
2	3 NIGHTLY BATCH CDE DEL OLD CDE	4 NIGHTLY BATCH CDE DEL OLD CDE	5 NIGHTLY BATCH CDE DEL OLD CDE	6 NIGHTLY BATCH CDE DEL OLD CDE	7 NIGHTLY BATCH CDE DEL OLD CDE	8 BATCH CLEANUP HPV CLEANUP
9	10 NIGHTLY BATCH CDE DEL OLD CDE	11 NIGHTLY BATCH CDE DEL OLD CDE	12 NIGHTLY BATCH CDE DEL OLD CDE	13 NIGHTLY BATCH CDE DEL OLD CDE	14 NIGHTLY BATCH CDE DEL OLD CDE	15 BATCH CLEANUP HPV CLEANUP
16	17 NIGHTLY BATCH CDE DEL OLD CDE	18 NIGHTLY BATCH CDE DEL OLD CDE	19 NIGHTLY BATCH CDE DEL OLD CDE	20 NIGHTLY BATCH CDE DEL OLD CDE	21 NIGHTLY BATCH CDE DEL OLD CDE	22 BATCH CLEANUP HPV CLEANUP
23	24 NIGHTLY BATCH CDE DEL OLD CDE	25 NIGHTLY BATCH CDE DEL OLD CDE	26 NIGHTLY BATCH CDE DEL OLD CDE	27 NIGHTLY BATCH CDE DEL OLD CDE UNK-GEN&UNGEN	28 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	29 BATCH CLEANUP HPV CLEANUP
30	31 NIGHTLY BATCH CDE DEL OLD CDE	1 sep.	2	3	4	5

notes:

september 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
30 aug.	31	1	2	3	4	5
		NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
		CDE	CDE	CDE	CDE	HPV CLEANUP
		DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
6	7	8	9	10	11	12
	Federal Holiday					
		NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
		CDE	CDE	CDE	CDE	HPV CLEANUP
		DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
	LABOR DAY					
13	14	15	16	17	18	19
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
20	21	22	23	24	25	26
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
					UNK-GEN&UNGEN	
27	28	29	30	1 oct.	2	3
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH			
	CDE	CDE	CDE			
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE			
	COMPL HISTORY	QTRLY COMPL				

notes:

FY09 DATA (10/1/2008-09/30/2009) DUE IN AFS BY 11/30/2009

october 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
27 sep.	28	29	30	1	2	3
				NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
				CDE	CDE	HPV CLEANUP
				DEL OLD CDE	DEL OLD CDE	
				Historic CMS		
				FY10 BEGINS		
4	5	6	7	8	9	10
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
11	12	13	14	15	16	17
	Federal Holiday					
		NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
		CDE	CDE	CDE	CDE	HPV CLEANUP
		DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
	COLUMBUS DAY					
18	19	20	21	22	23	24
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
25	26	27	28	29	30	31
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
			UNK-UNGEN ONLY	COMPL HISTORY		

notes:

november 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
1	2 NIGHTLY BATCH CDE DEL OLD CDE	3 NIGHTLY BATCH CDE DEL OLD CDE	4 NIGHTLY BATCH CDE DEL OLD CDE	5 NIGHTLY BATCH CDE DEL OLD CDE	6 NIGHTLY BATCH CDE DEL OLD CDE	7 BATCH CLEANUP HPV CLEANUP
8	9 NIGHTLY BATCH CDE DEL OLD CDE	10 NIGHTLY BATCH CDE DEL OLD CDE	11 **Federal Holiday** VETERAN'S DAY	12 NIGHTLY BATCH CDE DEL OLD CDE	13 NIGHTLY BATCH CDE DEL OLD CDE	14 BATCH CLEANUP HPV CLEANUP
15	16 NIGHTLY BATCH CDE DEL OLD CDE	17 NIGHTLY BATCH CDE DEL OLD CDE	18 NIGHTLY BATCH CDE DEL OLD CDE	19 NIGHTLY BATCH CDE DEL OLD CDE	20 NIGHTLY BATCH CDE DEL OLD CDE	21 BATCH CLEANUP HPV CLEANUP
22	23 NIGHTLY BATCH CDE DEL OLD CDE	24 NIGHTLY BATCH CDE DEL OLD CDE UNK-UNGEN ONLY	25 NIGHTLY BATCH CDE DEL OLD CDE COMPL HISTORY	26 **Federal Holiday** THANKSGIVING	27 NIGHTLY BATCH CDE DEL OLD CDE	28 BATCH CLEANUP HPV CLEANUP
29	30 NIGHTLY BATCH CDE DEL OLD CDE	1 dec.	2	3	4	5

notes:

december 2009

SUNDAY	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY
29 nov.	30	1	2	3	4	5
		NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
		CDE	CDE	CDE	CDE	HPV CLEANUP
		DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
		FY09 EOY REVIEW	FY09 EOY REVIEW	FY09 EOY REVIEW	FY09 EOY REVIEW	
6	7	8	9	10	11	12
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
13	14	15	16	17	18	19
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	BATCH CLEANUP
	CDE	CDE	CDE	CDE	CDE	HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	
20	21	22	23	24	25	26
					Federal Holiday	
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH		BATCH CLEANUP
	CDE	CDE	CDE	CDE		HPV CLEANUP
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE		
					CHRISTMAS	
27	28	29	30	31	1 jan.	2
	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH	NIGHTLY BATCH		
	CDE	CDE	CDE	CDE		
	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE	DEL OLD CDE		
	UNK-GEN&UNGEN	COMPL HISTORY	QTRLY COMPL			

notes:

Appendix 10

AFS Contingency Planning Data Entry Forms

BACKGROUND

The Air Facility System (AFS) contains compliance, enforcement and permit data for stationary sources of air pollution regulated by the US EPA and state and local air pollution agencies. This information is used by the environmental regulatory community to track the compliance of stationary sources with various programs regulated under the Clean Air Act.

In the event of a disaster resulting in AFS being inaccessible nationally, a user should, *as much as is practicable* :
1. Notify the relevant personnel
2. Ensure that data is recorded as is detailed in the AFS Contingency Data Entry Form
3. Return the recorded data to EPA at scheduled intervals

In order to maintain a continuity of operations, the following workbook containing 12 worksheets (*each worksheet representing an AFS record*) has been developed to facilitate the recording of AFS data in the event of a disaster. **It is recommended that this worksheet be printed out so that a hardcopy is available in the event that your computer system is unavailable**.

INSTRUCTIONS FOR COMPLETING THIS WORKBOOK

The top of each worksheet includes a additional information in the upper left hand. Please read the notes for specific information pertaining to that worksheet. And be sure to enter in all of the Minimum Data Requirements (MDRs). The following worksheets are enclosed in this workbook:

Compliance Enforcement *(worksheets prefixed with "CE")*
- Plant General
- Air Program
- Air Program Pollutant
- Action

Permits *(worksheets prefixed with "P")*
- Permit
- Permit Event

Continuous Emissions Monitoring *(worksheets pre-fixed with "CEM")*
- Point
- Air Program
- Monitor
- Excess Emission Report

Compliance Monitoring Strategy *(worksheets titled "CMS")*
- CMS

Comment *(worksheets titled "Comment")*
- Comment

CONTACTS

Akachi Imegwu
AFS Security Manager
202-564-0045

Betsy Metcalf
AFS System Administrator
202-564-5962

Helpline: 1-800-367-1044
Website: http://www.epa.gov/compliance/data/systems/air/afssystem.html
Technical Support Mailbox: afs-support@epa.gov

Please be sure to keep in contact with your respective Regional AFS Compliance Manager

NOTE
The Plant General Record contains identification information on a source.

Use the FIPS Code for entering the State and County code.

Fields in Yellow contain minimum data requrements.

TABLE DESCRIPTION
STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
PNME -- Plant Name
STRT -- Street Address
CYCD -- City Code
CYNM -- City Name
ZIPC -- Zip Code
SIC1 -- Primary SIC Code
GOVT -- Governmental Facility Code
NIC1 -- NAICS Code
STRS -- State Registration Number
LCON -- Local Control Region
PAFS -- AFS ID

STTE	CNTY	PCDS	PNME	STRT	CYCD	CYNM	ZIPC	SIC1	GOVT	NIC1	STRS	LCON	PAFS

NOTE

The Air Program record contains information on the regulatory program of the Clean Air Act that is applicable to a source

Fields in yellow contain minimum data .requirements

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
APC1 -- Air Program Code
AST1 -- Air Program Operating Status
SPT1 -- CFR Subparts 1 thru 12

STTE	CNTY	PCDS	APC1	AST1	SPT1 CFR SP 1	SPT1 CFR SP 2	SPT1 CFR SP 3	SPT1 CFR SP 4	SPT1 CFR SP 5	SPT1 CFR SP 6	SPT1 CFR SP 7	SPT1 CFR SP 8	SPT1 CFR SP 9	SPT1 CFR SP 10	SPT1 CFR SP 11	SPT1 CFR SP 12

NOTE

Each source in AFS is required to have at least one air program and one air program pollutant. Every applicable air program for a source must have at least one air program pollutant.

Fields in yellow contain minimum data requirements.

ECAP, ECLP, & EATT will be populated by the EPA.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
APC1 -- Air Program
PLAP -- Pollutant
CAPP -- Chemical Abstract Service Number
SCAP -- State Compliance Status
SCLP -- State Class
SATT -- State Attainment Indicator
ECAP -- EPA Compliance Status
ECLP -- EPA CLass
EATT -- EPA Attainment Indicator

STTE	CNTY	PCDS	APC1	PLAP	CAPP	SCAP	SCLP	SATT	ECAP	ECLP	EATT

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
ANU1 -- Action Number
KAN1 -- Key Action Number
ACS1 -- Air Program Code (1 thru 6)
ATP1 -- Action Type
DTS1 -- Date Scheduled
DTA1 -- Date Achieved
PAM1 -- Penalty Amount
RSC1 -- Results Code
SCC1 -- Staff Code
PLC1 -- Pollutant
CAA1 -- CAS Number
RD81 -- RDE 8
R161 -- RDE 16
LDC1 -- Lead Agency
VID1 -- Violating Identifier
VTP1 -- Violation Type Code (1 thru 7)
VPL1 -- Violating Pollutant (1 thur 3)

NOTE

The Action record contains information on the various activities that have taken place at a source. The fields in Yellow contain minimum data requirements. Further notes are as follows:

-**Key Action Number (KAN1)** is an MDR for violation pathways.
-**Results Code (RSC1)** Pass/Fail/Pending (PP/FF/99) codes are reported for Stack Test actions.
-**RD08 Certification Deviations (RD81)** EPA reports into AFS unless otherwise negotiated. Deviations are reported by EPA: Y= Yes, N=No, or a number of deviations reported may be entered. Note: Compliance status is to be reported in the Results Code field: MC=In Compliance, MV= In Violation, MU = Unknown.
-**Date Scheduled (DTS1)** Due Date of a Title V ACC will be reported as Date Scheduled on the "Title V ACC Due/Received by EPA" action, and is not enforcement sensitive.

MINIMUM DATA REQUIREMENTS -- MINIMUM REPORTABLE ACTIONS

Actions are to be Reported within 60 Days of Event as reported in the Date Achieved (DTA1) field of the action record for state and local agencies [with a minimum upload of six (6) times per year].

- **Informal Enforcement Actions:** Notice of Violation(s)
- **Formal Enforcement Actions**: Administrative Order(s) and Assessed Penalties, Consent Decrees and Agreements, Civil and Criminal Referrals, Civil and Criminal Actions
- **Title V Annual Compliance Certification [ACC] Reviewed:** Includes Results Codes for ACC reviews: in compliance (MC), in violation (MV) and unknown (MU). ACC deviations(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated).
- **HPV Violation Discovered:** Linked actions are FCEs, PCEs, Stack Tests (Observed or Reviewed), Title V ACCs, Stack Test Notification Receipt
- **HPV Addressing Actions:** Linked actions include but are not limited to State/EPA Civil or Criminal Referrals, State/EPA Civil or Criminal Actions, Administrative Orders, Consent Decrees, Source Returned to Compliance by State/EPA with no Further Action Required.
- **HPV Resolving Actions:** Linked actions include but are not limited to Violation Resolved, Closeout Memo Issued, Source Returned to Compliance by State/EPA with no Further Action Required.
- **Full Compliance Evaluations** (On or Off Site)
- **Stack Tests:** Pass/Fail/Pending codes (PP/FF/99) are reported in the results code field, pending codes must be updated within 120 days.
- **Title V Annual Compliance Certification Due/Received:** Reported by EPA unless otherwise negotiated. The Due Date of a Title V ACC will be reported as Date Scheduled on the "Title V ACC Due/Received by EPA" action, and is not enforcement sensitive.
- **Investigations:** EPA Investigation Initiated (started) and State/EPA Investigation Conducted (finished). State Investigation Initiated is added for optional use. EPA and State Investigation Initiated (started) action types are enforcement sensitive.

STTE	CNTY	PCDS	ANU1	KAN1	ACS1 AP Code 1	ACS1 AP Code 2	ACS1 AP Code 3	ACS1 AP Code 4	ACS1 AP Code 5	ACS1 AP Code 6	ATP1	DTS1	DTA1	PAM1	RSC1	SCC1	PLC1	CAA1	RD81

STTE	CNTY	PCDS	ANU1	KAN1	ACS1 AP Code 1	ACS1 AP Code 2	ACS1 AP Code 3	ACS1 AP Code 4	ACS1 AP Code 5	ACS1 AP Code 6	ATP1	DTS1	DTA1	PAM1	RSC1	SCC1	PLC1	CAA1	RD81

R161	LDC1	VID1	VTP1 Type Code 1	VTP1 Type Code 2	VTP1 Type Code 3	VTP1 Type Code 4	VTP1 Type Code 5	VTP1 Type Code 6	VTP1 Type Code 7	VPL1 Pollutant 1	VPL1 Pollutant 2	VPL1 Pollutant 3

R161	LDC1	VID1	VTP1 Type Code 1	VTP1 Type Code 2	VTP1 Type Code 3	VTP1 Type Code 4	VTP1 Type Code 5	VTP1 Type Code 6	VTP1 Type Code 7	VPL1 Pollutant 1	VPL1 Pollutant 2	VPL1 Pollutant 3

NOTE

AFS Compliance Monitoring Strategy record contains information on stationary source air compliance monitoring programs.

Fields in Yellow contain minimum data requirements.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
CMSC -- Source Category
CMSI -- CMS Min Frequency Indicator
CMYA -- Fiscal Year of FCE A
CMOA -- On Site Visit Indicator A
CMYB -- Fiscal Year of FCE B
CMOB -- On Site Visit Indicator B
CMYC -- Fiscal Year of FCE C
CMOC -- On Site Visit Indicator C
CMYD -- Fiscal Year of FCE D
CMOD -- On Site Visit Indicator D
CMYE -- Fiscal Year of FCE E
CMOE -- On Site Visit Indicator E
CM19 -- CMS Comment

STTE	CNTY	PCDS	CMSC	CMSI	CMYA	CMOA	CMYB	CMOB	CMYC	CMOC	CMYD	CMOD	CMYE	CMOE	CM19

NOTE

The following fields are necessary for a complete permit draft record; STTE, ASPN, PMTC & PAFS.

TABLE DESCRIPTION

STTE -- State Code
ASPN -- Permit ID
PMTC -- Category
PMFD -- Effective Date
ASRD -- Mod/Renewal Effective Date
PMXD -- Expiration Date (Projected)
AAD1 -- Permitting Authority Data Element
CNTY -- County
PAFS -- AFS ID

STTE	ASPN	PMTC	PMFD	ASRD	PMXD	AAD1	CNTY	PAFS

NOTE

To ensure a full and complete permit event record ALL the fields in the table are necessary. Please fill out completely.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PAFS -- AFS ID
PAPN -- Permit ID
PATY -- Event Type
PACN -- Event Number
PDEA -- Date Achieved
PARC -- Results

STTE	CNTY	PAFS	PAPN	PATY	PACN	PDEA	PARC

NOTE

To ensure a full and complete point general record ALL the fields in the table are necessary. Please fill out completely.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
PNUM -- Point ID
CEID -- Point C/E ID
DSC3 -- Point Description

STTE	CNTY	PCDC	PNUM	CEID	DSC3

NOTE

The following fields are necessary for a complete point air program record; STTE, CNTY, PCDS, PNUM, CEID, APC3, SCA3 & AST3. Please fill out completely.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
PNUM -- Point ID
CEID -- Point C/E ID
APC3 -- Point Air Program
SPT3 -- Point Level Sub Part (1 thru 12)
SCA3 -- Point Compliance Status
AST3 -- Point Operating Status

STTE	CNTY	PCDS	PNUM	CEID	APC3	SPT3 SubPart 1	SPT3 SubPart 2	SPT3 SubPart 3	SPT3 SubPart 4	SPT3 SubPart 5	SPT3 SubPart 6	SPT3 SubPart 7	SPT3 SubPart 8	SPT3 SubPart 9	SPT3 SubPart 10	SPT3 SubPart 11	SPT3 SubPart 12	SCA3	AST3

NONE

The following fields are necessary for a complete monitor record; STTE, CNTY, PCDS, PNUM, CEID, & CHNM, as they are used to identify the equipment. In addition please enter information for at least ONE of the following fields to provide descriptive information about the equipment: MTMR, MTMN, MTSN, MTRC, CEMA, PEML, MTID, PSTD, PSTS &/or CEDT.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
PNUM -- Point ID
CEID -- Point C/E ID
CHNM -- Channel Number
MTMR -- Manufacturer
MTMN -- Model Number
MTSN -- Serial Number
MTRC -- Requirement Code
CEMA -- Enforcement Agency
PEML -- Permissible Limit
MTID -- Installation Date
PSTD -- Performance Specification Date
PSTS -- Performance Specification Status
CEDT -- Certification Date

STTE	CNTY	PCDS	PNUM	CEID	CHNM	MTMR	MTMN	MTSN	MTRC	CEMA	PEML	MTID	PSTD	PSTS	CEDT

NOTE

The following fields are necessary for a complete excess emission report record; STTE, CNTY, PCDS, PNUM, CEID, CHNE & RQT3. In addition please enter information for at least ONE of the following fields to provide descriptive information about the emission; ACSP, TSOT, TIMC, STSH, CLSB, UNEE, CLEF, CLMU, PPRO, PPRU, INEE, FUPB, OKEE, MTEM, MNEM, CALB, UNMD, OKMD &/or INMD.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
PNUM -- Point ID
CEID -- Point C/E ID
CHNE -- Channel Number
RQT3 -- Report Quarter
ACSP -- EER Air Program (1 thru 6)
TSOT -- Total Source Operating Time
TIMC -- Time Period Code
STSH -- Start-up / Shut-down
CLSB -- Cleaning / Soot-blowing
UNEE -- Unknown Excess
CLEF -- Control Equipment Failure
CLMU -- Control Equipment Malfunction Unacceptable
PPRO -- Process Problems
PPRU -- Process Problems Unacceptable
INEE -- Number of Incidents of Excess Emissions
FUPB -- Fuel Problems
OKEE -- Other Known Excesses
MTEM -- Monitor Equipment Malfunction
MNEM -- Non-Monitor Equipment Malfunction
CALB -- Calibration
UNMD -- Unknown Monitor Downtime
OKMD -- Other Known Monitor Downtime
INMD -- Number of Incidents of Monitor Downtime

STTE	CNTY	PCDS	PNUM	CEID	CHNE	RQT3		ACSP	ACSP	ACSP	ACSP	ACSP	ACSP	TSOT	TIMC	STSH	CLSB	UNEE	CLEF	CLMU	PPRO	PPRU	INEE	FUPB	OKEE	MTEM	MNEM	CALB	UNMD
						YEAR	QTR	EER AIR PRGM 1	EER AIR PRGM 2	EER AIR PRGM 3	EER AIR PRGM 4	EER AIR PRGM 5	EER AIR PRGM 6																

OKMD	INMD

NOTE

If the comment is against the whole plant then an action # is NOT needed. If the comment is for a specific action all fields are necessary.

TABLE DESCRIPTION

STTE -- State Code
CNTY -- County Code
PCDS -- Plant ID
ANU1 -- Action Number
CNU1 -- Comment Number
COM1 -- Comment

STTE	CNTY	PCDS	ANU1	CNU1	COM1

BACKGROUND

The Air Facility System (AFS) contains compliance, enforcement and permit data for stationary sources of air pollution regulated by the US EPA and state and local air pollution agencies. This information is used by the environmental regulatory community to track the compliance of stationary sources with various programs regulated under the Clean Air Act.

In the event of a disaster resulting in AFS being inaccessible nationally, a user should, *as much as is practicable* :
1. Notify the relevant personnel
2. Ensure that data is recorded as is detailed in the AFS Contingency Data Entry Form
3. Return the recorded data to EPA at scheduled intervals

In order to maintain a continuity of operations, the following workbook containing 12 worksheets (*each worksheet representing an AFS record*) has been developed to facilitate the recording of AFS data in the event of a disaster. **It is recommended that this worksheet be printed out so that a hardcopy is available in the event that your computer system is unavailable**.

INSTRUCTIONS FOR COMPLETING THIS WORKBOOK

The top of each worksheet includes a additional information in the upper left hand. Please read the notes for specific information pertaining to that worksheet. And be sure to enter in all the the Minimum Data Requirements (MDRs). The following worksheets are enclosed in this workbook:

Compliance Enforcement *(worksheets prefixed with "CE")*
- Plant General
- Air Program
- Air Program Pollutant
- Action

Permits *(worksheets prefixed with "P")*
- Permit
- Permit Event

Continuous Emissions Monitoring *(worksheets pre-fixed with "CEM")*
- Point
- Air Program
- Monitor
- Excess Emission Report

Compliance Monitoring Strategy *(worksheets titled "CMS")*
- CMS

Comment *(worksheets titled "Comment")*
- Comment

CONTACTS

Akachi Imegwu
AFS Security Manager
202-564-0045

Betsy Metcalf
AFS System Administrator
202-564-5962

Helpline: 1-800-367-1044
Website: http://www.epa.gov/compliance/data/systems/air/afssystem.html
Technical Support Mailbox: afs-support@epa.gov

Please be sure to keep in contact with your respective Regional AFS Compliance Manager

Compliance Enforcement - Plant General Record
This table contains general information describing the plant and its physical location.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	A two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	A three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	A five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
PNME	Plant Name	The name associated with a plant at a given location.	
STRT	Street Address	The street address for the physical location of the plant.	PO Box is not a valid value
CYCD	City Code	Either City Code or City Name is to be entered in.	
CYNM	City Name		
ZIPC	Zip Code	The zip code for the physical location of the plant	
SIC1	Primary SIC Code	Enter SIC if NAICS is not available. Either NAICS or SIC is required.	
GOVT	Government Facility Code	A one character code identifying facilities owned or operated by a governmental unit.	**0**-all other facilities not owned or operated by a federal, state, or local government; **1**-source owned or operated by the federal government; **2**-source owned or operated by the state; **3**-source owned or operated by the county; **4**-source owned or operated by the municipality; **5**-source owned or operated by the district
NIC1	NAICS Code	Enter NAICS if SIC is not available. Either NAICS or SIC is required.	
STRS	State Registration Number	This could be the ID that is internal to the particular State or Local Agency	Up to 15 alphanumeric characters
LCON	Local Control Region	A user-defined 2 character code identifying the local control region with jurisdiction over a plant	2 alphanumeric characters
PAFS	AFS ID	A fifteen-character plant identifier required to enter permit information for plants. It must be unique within a county and requires the FIPS State and County Codes to uniquely identify a plant in AFS. The AFS ID must be established on the Plant prior to submitting permit information. Business Rule Guidance - Each AFS Plant ID Should Be Assigned A Unique Permit ID	Up to 15 alphanumeric characters

Compliance Enforcement - Air Program Record
This record contains information on the regulatory program of the Clean Air Act that is applicable to a source

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
APC1	Air Program Code	a one character alphanumeric code used to identify the regulatory air program(s) a plant or point is subject to and the regulatory air program(s) authorizing and associated with an action taken by a local, state or federal regulatory agency.	**A** Acid Precipitation, **F** – FESOP – (Non-Title V), **I** - Native American, **M** - MACT (Section 63 NESHAPS), **V** - Title V Permits, **0** - SIP Source, **1** - SIP Source Under Federal Jurisdiction, **3** - Non-Federally Reportable Source, **4** - CFC Tracking, **6** - PSD, **7** - NSR, **8** - NESHAP, **9** - NSPS
AST1	Air Program Operating Status	represents the operational condition of a plant associated with a given air program	**O**-operating, **P**- planned (has applied for a construction permit), **C**- under construction, **T**- temporarily closed, **X** - permanently closed, **I** - seasonal, **D** - NESHAP demolition, **R** - NESHAP renovation, **S** - NESHAP spraying, **L** - landfill
SPT1 CFR SP 1	CFR Subparts 1 thru 12	Subparts are codes indicating the subpart for air programs: "9" - NSPS; "8" -NESHAP and; "M" - MACT NESHAP. The subpart information pertains to sections 60, 61 and 63 of the code of federal regulations respectively. NSPS Subparts may also be entered on the SIP air program. Subpart data is required for NSPS, NESHAPS, and MACT air program codes. Subparts may be indicated on the SIP air program if applicable. Up to 12 subpart codes may be associated with each plant air program.	The Subpart Code must exist on the subparts code table for the correct air program. Refer to the UI Cross Reference Tables or the AFS database for current listing of subparts.
SPT1 CFR SP 2			
SPT1 CFR SP 3			
SPT1 CFR SP 4			
SPT1 CFR SP 5			
SPT1 CFR SP 6			
SPT1 CFR SP 7			
SPT1 CFR SP 8			
SPT1 CFR SP 9			
SPT1 CFR SP 10			
SPT1 CFR SP 11			
SPT1 CFR SP 12			

Compliance Enforcement - Air Program Pollutant Record
This record contains data fields used to describe the pollutants linked to the source under regulation for a specific air program.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
APC1	Air Program Code	a one character code used to identify the regulatory air program(s) a plant or point is subject to and the regulatory air program(s) authorizing and associated with an action taken by a local, state or federal regulatory agency.	**A** Acid Precipitation **F** – FESOP – (Non-Title V), **I** - Native American, **M** - MACT (Section 63 NESHAPS), **V** - Title V Permits, **0** -SIP Source, **1** - SIP Source Under Federal Jurisdiction, **3** - Non-Federally Reportable Source, **4** - CFC Tracking, **6** - PSD, **7** - NSR, **8** - NESHAP, **9** - NSPS
PLAP	Pollutant Code	a five character code or up to 9 digit Chemical Abstract Service Number identifying a pollutant tracked at the plant level on the pollutant air program (MDR if criteria). It is a supporting element for actions.	**Either PLAP or CAPP are required.** This 5-digit code can be retrieved from the AFS database, or the UI Cross Reference Tables
CAPP	Chemical Abstract Service Number	If the pollutant code is not available then the Chemical Abstract Service Number must be supplied.	**Either PLAP or CAPP are required.** This 9-digit code can be taken from the internet or from the AFS website, or the UI Cross Reference Tables
SCAP	State Pollutant Compliance Status	a one-character code which reflects the state agency's determination of the compliance status of a facility with regards to pollutants regulated by an air program or by the procedural requirements of a permit. Compliance falls within four categories: in, out, on schedule, and unknown. Values entered at the plant air program pollutant level are compared by AFS, and the most serious generated and displayed at the plant air program level. The most serious of the air program values are in turn displayed at the plant general level.	[*in order from worst to best case*]: **Out of compliance**: **B** - in violation with regard to both emissions and procedural compliance, **1**- in violation no schedule, **6** - in violation-not meeting schedule, **W** - in violation with regard to procedural compliance. **Unknown compliance**: **Y** - unknown with regard to both emissions and procedural compliance, **0** - unknown compliance status, **A** - unknown with regard to procedural compliance, **7** - in violation - unknown with regard to schedule. **On schedule**: **5** - meeting compliance schedule. **In compliance**: **C** - in compliance with procedural requirements, **4** - in compliance- certification, **3** - in compliance-inspection, **M** - in compliance-cems, **2** - in compliance-source test, **8** - no applicable state regulation, **9** - in compliance-shut down, **P** - present, see other program(s).
SCLP	State Pollutant Classification	a two character code assigning a plant classification to individual criteria pollutants regulated by an air program. This code may be different than the EPA pollutant classification.	**A - Major emissions**; actual or potential emissions are above the applicable major source thresholds, **SM - Synthetic Minor emissions**; Potential emissions are below all applicable major source thresholds if an only if the sources complies with Federally enforceable regulations or limitations (Potential to emit at the major threshold but due to operation restrictions or other controls emit at the minor level), **B - Minor emission**; Potential uncontrolled emissions are below the applicable major source thresholds, **C - Emissions classification is unknown**.
SATT	State Attainment Indicator	A one character code identifying the criteria pollutant attainment status for the county in which the plant is located. This field is mandatory only for air programs other than NESHAP and in conjunction with the following criteria pollutants: VOC, PT, SO2.	**A** - Attainment area for given pollutant; **M** - Moderate (for VOC, NO2, CO and particulate); **S** - Serious (for VOC, NO2, CO and particulate); **V** - Severe (for VOC and NO2); **X** - Extreme (for VOC and NO2); **T** - Transport region not serious, severe, or extreme (VOC only); **N** - All other non-attainment for primary and secondary standards; **1** - Non-attainment for primary SO2 standards; **2** – Non-attainment for secondary PT or SO2 standards; **U** - Unclassified
ECAP	EPA Pollutant Compliance Status	a one-character code which reflects the state agency's determination of the compliance status of a facility with regards to pollutants regulated by an air program or by the procedural requirements of a permit. **This value is normally populated only when the EPA assessment differs from the state.** Compliance falls within four categories: in, out, on schedule, and unknown. Values entered at the plant air program pollutant level are compared by AFS, and the most serious generated and displayed at the plant air program level. The most serious of the air program values are in turn displayed at the plant general level.	[*in order from worst to best case*]: **Out of compliance**: **B** - in violation with regard to both emissions and procedural compliance, **1**- in violation no schedule, **6** - in violation-not meeting schedule, **W** - in violation with regard to procedural compliance. **Unknown compliance**: **Y** - unknown with regard to both emissions and procedural compliance, **0** - unknown compliance status, **A** - unknown with regard to procedural compliance, **7** - in violation - unknown with regard to schedule. **On schedule**: **5** - meeting compliance schedule. **In compliance**: **C** - in compliance with procedural requirements, **4** - in compliance- certification, **3** - in compliance-inspection, **M** - in compliance-cems, **2** - in compliance-source test, **8** - no applicable state regulation, **9** - in compliance-shut down, **P** - present, see other program(s).
ECLP	EPA Pollutant Classification	A one character code identifying the criteria pollutant attainment status for the county in which the plant is located. This field is mandatory only for air programs other than NESHAP and in conjunction with the following criteria pollutants: VOC, PT, SO2. **This field is used when an EPA classification value differs from the classification value submitted by a state.**	**A - Major emissions**; actual or potential emissions are above the applicable major source thresholds, **SM - Synthetic Minor emissions**; Potential emissions are below all applicable major source thresholds if an only if the sources complies with Federally enforceable regulations or limitations (Potential to emit at the major threshold but due to operation restrictions or other controls emit at the minor level), **B - Minor emission**; Potential uncontrolled emissions are below the applicable major source thresholds, **C - Emissions classification is unknown**.
EATT	EPA Attainment Nonattainment Indicator	A one character code identifying the criteria pollutant attainment status for the county in which the plant is located. This field is mandatory only for air programs other than NESHAP and in conjunction with the following criteria pollutants: VOC, PT, SO2. **This field is used when an EPA attainment/non-attainment indicator value differs from an attainment/non-attainment indicator value submitted by a state.**	**A** - Attainment area for given pollutant; **M** - Moderate (for VOC, NO2, CO and particulate); **S** - Serious (for VOC, NO2, CO and particulate); **V** - Severe (for VOC and NO2); **X** - Extreme (for VOC and NO2); **T** - Transport region not serious, severe, or extreme (VOC only); **N** - All other non-attainment for primary and secondary standards; **1** - Non-attainment for primary SO2 standards; **2** – Non-attainment for secondary PT or SO2 standards; **U** - Unclassified

Compliance Enforcement - Action Record
This record contains fields related to an action associated to an air program.

Data Element Acronym		Data Element Name	Description	Valid Values
STTE		State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY		County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS		Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
ANU1		Action Number	A three digit numeric action identifier.	Numeric values between 1 and 999; input values of 999 will generate the next available sequential action number.
KAN1		Key Action Number	A key action number assigned to an action to indicate which violation pathway the action is linked. An action can be linked into a maximum of five pathways.	For violation pathways, KAN1 is an MDR. Key action numbers for an action will be assigned, when requested, to national action type **2E - State Day Zero**
ACS1	**AP Code 1**	Air Program Code (1 thru 6)	a one character code used to identify the regulatory air program(s) a plant or point is subject to and or the regulatory air program(s) authorizing and associated with an action taken by a local, state or federal regulatory agency.	**A** - Acid Precipitation, **F** – FESOP – (Non-Title V), **I** - Native American, **M** - MACT (Section 63 NESHAPS), **V** - Title V Permits, **0** - SIP Source, **1** - SIP Source Under Federal Jurisdiction, **3** - Non-Federally Reportable Source, **4** - CFC Tracking, **6** - PSD, **7** - NSR, **8** - NESHAP, **9** - NSPS
ACS1	**AP Code 2**			
ACS1	**AP Code 3**			
ACS1	**AP Code 4**			
ACS1	**AP Code 5**			
ACS1	**AP Code 6**			
ATP1		Action Type	a two character code identifying a compliance activity. Two categories of action types exist: national action types, which are used to retrieve similar compliance activities identified by EPA regions using region-specific action type codes; and regional action types, which are the region-specific codes used to identify a compliance activity	The action type code must exist on the AFS list of actions. Refer to the UI Cross Reference tables or the AFS database for the listing of action types by region or national.
DTS1		Date Scheduled	the date on which a compliance action is scheduled to be performed.	DTS1 is a necessary field when entering TV Annual Compliance Certification due dates.
DTA1		Date Achieved	the date on which a compliance action (activity) is completed	Date format must be "YYYYMMDD"
PAM1		Penalty Amount	the civil penalty assessed against a facility in the final agreement between the enforcement authority and the plant.	0 - 999,999,999 (commas are not entered)
RSC1		Results code	an MDR for stack test results. The conclusion of all stack tests should be recorded using two character codes indicating "Pass" , "Fail", or "99" for pending. It is a supporting element for all other actions.	RSC1 is required when entering TV Annual Compliance Certification
SCC1		Staff Code	three character code identifying: 1) the compliance or enforcement official assigned to monitor the compliance status of a plant, or 2) the staff member assigned to complete an action.	The staff code must exist on the staff code table. Please refer to the UI cross-reference tables, or the AFS for staff code listings.
PLC1		Pollutant	a five character code or up to 9 digit Chemical Abstract Service Number identifying a pollutant tracked at the plant level on the pollutant air program (MDR if criteria). It is a supporting element for actions.	Code must exist on the pollutant table
CAA1		CAS Number	a five character code or up to 9 digit Chemical Abstract Service Number identifying a pollutant tracked at the plant level on the pollutant air program (MDR if criteria). It is a supporting element for actions.	
RD81		RDE 8	A field defined by users and used to maintain information relating to plant or point level actions.	RDO8 Certification Deviations (RD81) EPA reports into AFS unless otherwise negotiated. Deviations are to be reported by EPA: Y= Yes, N=No, or a number of Deviations reported may be entered. Note that compliance status is to be reported in the Results Code field: MC=in compliance, MV= in Violation, MU = Unknown.
R161		RDE 16	A field defined by users and used to maintain information relating to plant or point level actions.	
LDC1		Lead Agency	a one character code that identifies the agency taking the lead role in tracking an action linking pathway to resolution.	**F** - FEDERAL; **J** - JOINT; **L** - LOCAL; **S** - STATE
VID1		Violating Identifier	a one character code that indicates which agency identified the violation that requires tracking to resolution using the action linking mechanism.	**F** - FEDERAL; **J** - JOINT; **L** - LOCAL; **S** - STATE
VTP1	**Type Code 1**	Violation Type Code (1 thru 7)	Three character code(s) that identify the types of violations cited for a violation or administrative penalty. Violation Type Code(s) may be input for violations or administrative penalties being tracked using the action linking mechanism.	Code entered must exist on table. Refer to the UI Cross Reference Tables for the listing of applicable violation type codes.
VTP1	**Type Code 2**			
VTP1	**Type Code 3**			
VTP1	**Type Code 4**			
VTP1	**Type Code 5**			
VTP1	**Type Code 6**			
VTP1	**Type Code 7**			
VPL1	**Pollutant 1**	Violating Pollutant (1 thru 3)	a five character code identifying a pollutant for the air program which has been identified as being in violation. This code enables a historical record of	Code must exist on the pollutant table. Refer to the UI Cross Reference Tables for the listing of applicable pollutant codes.
VPL1	**Pollutant 2**			
VPL1	**Pollutant 3**			

Permit - Permit Record
The following fields are necessary for a complete permit draft record; STTE, ASPN, PMTC & PAFS.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
ASPN	Permit ID	User defined value to identify a permit. The combination of State and Permit ID uniquely identifies a permit.	
PMTC	Category	A code that indicates the kind of Permit. Title V and Non-Title V Permits are both supported.	**C** - NON-TITLE V PERMIT - PERMIT TO CONSTRUCT; **G** - TITLE V PERMIT - GENERAL PERMIT; **N** - NON-TITLE V PERMIT - OPERATING PERMIT; **V** - TITLE V PERMIT - PLANT SPECIFIC
PMFD	Effective Date	The date a permit takes effect.	Date Format: YYYYMMDD
ASRD	Mod/Renewal Effective Date	The date the last modification or renewal to a permit takes effect.	Date Format: YYYYMMDD
PMXD	Expiration Date (Projected)	The projected date a permit is scheduled to expire and would no longer be in effect. Note: Submit a Permit Expires Event to reflect an Actual Permit Expiration Date where the permit has expired and is no longer in effect.	Date Format: YYYYMMDD
AAD1	Permitting Authority Data Element	Optional User-defined field provided for agency representatives to maintain permit information that relates to a permit or application.	
CNTY	County	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PAFS	AFS ID	A fifteen-character plant identifier required to enter permit information for plants. It must be unique within a county and requires the FIPS State and County Codes to uniquely identify a plant in AFS. The AFS ID must be established on the Plant prior to submitting permit information. Business Rule Guidance - Each AFS Plant ID Should Be Assigned A Unique Permit ID	

Permit - Permit Event Record
To ensure a full and complete permit event record ALL the fields in the table are necessary. Please fill out completely.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PAFS	AFS ID	A fifteen-character plant identifier required to enter permit information for plants. It must be unique within a county and requires the FIPS State and County Codes to uniquely identify a plant in AFS. The AFS ID must be established on the Plant prior to submitting permit information. Business Rule Guidance - Each AFS Plant ID Should Be Assigned A Unique Permit ID	
PAPN	Permit ID	User defined value to identify a permit. The combination of State and Permit ID uniquely identifies a permit.	
PATY	Event Type	A code identifying a permitting related activity. Once the permit is issued, these events can not be deleted from the data base (unless the entire permit is deleted).	Refer to the UI Cross Reference tables or the AFS database for the complete listing. Mandatory Events in the UI table
PACN	Event Number	A user defined number to identify permit event. Users may enter '999' to have AFS assign the next available number. The combination of State, County, AFS Plant ID, Permit Event Type and Permit Event Number uniquely identifies an event in AFS.	Integer values between 001 - 999
PDEA	Date Achieved	The date on which a permit event is completed. Title V and Non-Title V Permits are both supported.	yyyymmdd - Either Date Scheduled or Date Achieved is required
PARC	Results	A two-character code indicating whether an event has been achieved or if another event should be referred to.	Must exist on the UI table

Continuous Emissions Monitoring - Point General Record

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
PNUM	Point ID	A three-character field used to identify a point	Must be 3 alphanumeric characters
CEID	Point C/E ID	A one-character field used to distinguish emission point numbers from compliance point numbers and identify Merged points.	**C** – Compliance; **M** – Merged; *System-generated ("C") when adding a point to a compliance-only facility. User supplied value required when adding a point to a merged facility.*
DSC3	Point Description	A description of a point monitored for compliance.	Up to 25 alphanumeric characters

Continuous Emissions Monitoring - Point Air Program Record

The following fields are necessary for a complete point air program record; STTE, CNTY, PCDS, PNUM, CEID, APC3, SCA3 & AST3. Please fill out completely.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
PNUM	Point ID	A three-character field used to identify a point	Must be 3 alphanumeric characters
CEID	Point C/E ID	A one-character field used to distinguish emission point numbers from compliance point numbers and identify Merged points.	**C** – Compliance; **M** – Merged; *System-generated ("C") when adding a point to a compliance-only facility. User supplied value required when adding a point to a merged facility.*
APC3	Point Air Program	A one character code used to identify the regulatory air program(s) Point is subject to.	**A** - ACID PRECIPITATION; **F** – FESOP – (Non-Title V); **I** - NATIVE AMERICAN; **M** - MACT (SECTION 63 NESHAPS); **V** - TITLE V PERMITS **0** - SIP SOURCE; **1** - SIP SOURCE UNDER FEDERAL JURISDICTION; **3** - NON-FEDERALLY REPORTABLE SOURCE; **4** - CFC TRACKING **6** - PSD; 7 - NSR; **8** - NESHAP; **9** - NSPS
SPT3 SubPart 1 **SPT3** SubPart 2 **SPT3** SubPart 3 **SPT3** SubPart 4 **SPT3** SubPart 5 **SPT3** SubPart 6 **SPT3** SubPart 7 **SPT3** SubPart 8 **SPT3** SubPart 9 **SPT3** SubPart 10 **SPT3** SubPart 11 **SPT3** SubPart 12	Point Level Sub Part (1 thru 12)	Subparts are codes indicating the subpart for air programs: "9" - NSPS; "8" -NESHAP and; "M" - MACT NESHAP. The subpart information pertains to sections 60, 61 and 63 of the code of federal regulations respectively. NSPS Subparts may also be entered on the SIP air program. Subpart data is required for NSPS, NESHAPS, and MACT air program codes. Subparts may be indicated on the SIP air program if applicable. Up to 12 subpart codes may be associated with each plant air program.	The Subpart Code must exist on the subparts code table for the correct air program. Refer to the UI Cross Reference Tables or the AFS database for current listing of subparts.
SCA3	Point Compliance Status	A one-character code which reflects the state agency's determination of the compliance status of a facility with regards to pollutants regulated by an air program or by the procedural requirements of a permit. Compliance falls within four categories: in, out, on schedule, and unknown. Values entered at the point air program pollutant level are NOT bubbled up to the plant level.	
AST3	Point Operating Status	Represents the operational condition of a point associated with a given air program.	**O** operating; **P** planned (has applied for a construction permit); **C** under construction; **T** temporarily closed; **X** permanently closed; **I** seasonal; **D** NESHAP demolition; **R** NESHAP renovation; **S** NESHAP spraying; **L** - landfill

Continuous Emission Monitoring - Monitor Record

The following fields are necessary for a complete monitor record; STTE, CNTY, PCDS, PNUM, CEID, & CHNM, as they are used to identify the equipment. In addition please enter information for at least ONE of the following fields to provide descriptive information about the equipment: MTMR, MTMN, MTSN, MTRC, CEMA, PEML, MTID, PSTD, PSTS &/or CEDT.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
PNUM	Point ID	A three-character field used to identify a point	Must be 3 alphanumeric characters
CEID	Point C/E ID	A one-character field used to distinguish emission point numbers from compliance point numbers and identify Merged points.	**C** – Compliance; **M** – Merged; *System-generated ("C") when adding a point to a compliance-only facility. User supplied value required when adding a point to a merged facility.*
CHNM	Channel Number	A three-character code identifying the channel number associated with a point monitor.	**First character- parameter being monitored**: **0** - Air toxics monitor; **1** - Opacity monitor; **2** - Sulfur dioxide (so2) monitor; **3** - NOx monitor; **4** - Diluent (oxygen or carbon dioxide) monitor; **5** - Hydrocarbon; **6** - Total reduced sulfur (so2) monitor; **7** - Hydrogen disulfide monitor; **8** - Carbon monoxide; **9** - Coal sampling and analysis. **Second character - monitor indicator**: To indicate that the channel number is associated with a point monitor, the second position must equal "1". **Third character**: Single/group monitor number indicates if a monitor is the single monitor for the point or one of several monitoring the point; Single monitors are indicated by a value of "1"; Cluster monitors are indicated by a sequential number between 2-9.
MTMR	Manufacturer	The manufacturer of the primary component of the monitoring unit.	Up to 20 alphanumeric characters.
MTMN	Model Number	The monitor primary component model number.	Up to 15 alphanumeric characters.
MTSN	Serial Number	The serial number used to identify a primary component monitoring unit.	Up To 15 Alphanumeric Characters.
MTRC	Requirement Code	A one-character code identifying the air program regulation, enforcement action, compliance order, or consent decree requiring the installation of Continuous Emissions Monitoring equipment.	**A** - Acid rain precipitation; **0** - SIP Source; **1** - No Federal Requirement; **3** – Enforcement action, compliance order or consent decree; **6** - PSD; **9** - NSPS
CEMA	Enforcement Agency	A one character code identifying the federal, state or local agency with enforcement jurisdiction for Continuous Emission Monitoring at the plant.	**1** - EPA-Headquarters; **2** - EPA-Region; **3** - State; **4** - Local
PEML	Permissible Limit	The emission value and units specified by the monitor regulation emission value and units.	Up to 20 alphanumeric characters.
MTID	Installation Date	The year and month in which the monitor was installed.	Date format YYYYMM
PSTD	Performance Specifica	The year and month that the latest performance specification test was performed.	Date format YYYYMM
PSTS	Performance Specifica	The result of the latest performance specification test.	Pass; Fail
CEDT	Certification Date	The date the continuous emissions monitor received certification.	Date format YYYYMMDD

Continuous Emissions Monitor - Excess Emission Report Record

The following fields are necessary for a complete excess emission report record; STTE, CNTY, PCDS, PNUM, CEID, CHNE & RQT3. In addition please enter information for at least ONE of the following fields to provide descriptive information about the emission; ACSP, TSOT, TIMC, STSH, CLSB, UNEE, CLEF, CLMU, PPRO, PPRU, INEE, FUPB, OKEE, MTEM, MNEM, CALB, UNMD, OKMD &/or INMD.

Data Element Acronym		Data Element Name	Description	Valid Values
STTE		State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY		County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS		Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
PNUM		Point ID	A three-character field used to identify a point	Must be 3 alphanumeric characters
CEID		Point C/E ID	A one-character field used to distinguish emission point numbers from compliance point numbers and identify Merged points.	**C** – Compliance; **M** – Merged; *System-generated ("C") when adding a point to a compliance-only facility. User supplied value required when adding a point to a merged facility.*
CHNE		Channel Number	A three-character code identifying the channel number associated with a point monitor.	**First character- parameter being monitored**: **0** - Air toxics monitor; **1** - Opacity monitor; **2** - Sulfur dioxide (so2) monitor; **3** - NOx monitor; **4** - Diluent (oxygen or carbon dioxide) monitor; **5** - Hydrocarbon; **6** - Total reduced sulfur (so2) monitor; **7** - Hydrogen disulfide monitor; **8** - Carbon monoxide; **9** - Coal sampling and analysis. **Second character - monitor indicator**: To indicate that the channel number is associated with a point monitor, the second position must equal "1". **Third character**: Single/group monitor number indicates if a monitor is the single monitor for the point or one of several monitoring the point; Single monitors are indicated by a value of "1"; Cluster monitors are indicated by a sequential number between 2-9.
RQT3	YEAR QTR	Report Quarter	Identifies the year and quarter in which a Continuous Emissions Monitoring Excess Emissions Report was	Date format YYYYQQ; Where QQ represents quarter values of 01, 02, 03, 04
ACSP	EER AIR PRGM 1	EER Air Program (1 thru 16)	A one character code used to identify the regulatory air program(s) that is the reason an EER is produced.	**A** - ACID PRECIPITATION; **I** - NATIVE AMERICAN; **M** - MACT (SECTION 63 NESHAPS); **V** - TITLE V PERMITS; **0** - SIP SOURCE; **1** - SIP; SOURCE UNDER FEDERAL JURISDICTION; **3** - NON-FEDERALLY REPORTABLE SOURCE; **4** - CFC TRACKING; **6** - PSD; **7** - NSR; **8** - NESHAP; **9** - NSPS
ACSP	EER AIR PRGM 2			
ACSP	EER AIR PRGM 3			
ACSP	EER AIR PRGM 4			
ACSP	EER AIR PRGM 5			
ACSP	EER AIR PRGM 6			
TSOT		Total Source Operating Time	The total amount of time a plant is operating during the specified report quarter.	0 - 999,999
TIMC		Time Period Code	A one-character code indicating the units of time applied to quarterly excess emissions reported in an excess emissions report.	**M** - Minutes; **A** - 6 Minutes; **B** - 15 Minutes; **C** - 30 Minutes; **D** - 1 Hour (60 Minutes); **E** - 2 Hours (120 Minutes)
STSH		Start-up / Shut-down	A count of the quarterly excess emissions period units associated with the starting up or shutting down of the source.	0 - 999,999
CLSB		Cleaning / Soot-blowing	Count of the number of excess emission time periods due to cleaning/soot blowing, during the reporting quarter.	0 - 999,999
UNEE		Unknown Excess	The total number of quarterly excess emissions periods/units due to unknown reasons.	0 - 999,999
CLEF		Control Equipment Failure	Sum of quarterly excess emission period units due to unit/control equipment failure or malfunction.	0 - 999,999
CLMU		Control Equipment Malfunction Unacceptable	Sum of quarterly excess emission period units due to control equipment malfunctions that were deemed unacceptable. Used only if the control equipment malfunctions are a large portion of the total excess emissions, and a breakdown between acceptable malfunctions and any unacceptable malfunctions is deemed necessary. Guidance on the use of this field is available from each EPA Regional Continuous Emissions Monitoring coordinator.	0 - 999,999
PPRO		Process Problems	The summary total of quarterly excess emission period/units due to acceptable and unacceptable process problems defined by the monitoring agency.	0 - 999,999
PPRU		Process Problems Unacceptable	Sum of quarterly excess emission reporting period units due to process problems that were deemed unacceptable, as defined by the monitoring agency.	0 - 999,999
INEE		Number of Incidents of Excess Emissions	Total number of quarterly incidents of excess emissions recorded by a monitor.	0 - 999
FUPB		Fuel Problems	The number of quarterly period units the monitor recorded excess emissions due to fuel problems.	0 - 999,999
OKEE		Other Known Excessess	The number of period units during the quarter the monitor recorded excess emissions due to other known reasons.	0 - 999,999
MTEM		Monitor Equipment Malfunction	The number of quarterly monitor downtime period units due to the malfunction of the monitor equipment.	0 - 999,999
MNEM		Non-Monitor Equipment Malfunction	The number of quarterly monitor downtime period units due to the malfunction of non-monitor equipment.	0 - 999,999
CALB		Calibration	The number of quarterly time period units the source was operating and the monitor was not operating due to monitor calibration.	1 - 999,999
UNMD		Unknown Monitor Downtime	The number of quarterly monitor down time period/units due to unknown reasons.	0 – 999999
OKMD		Other Known Monitor Downtime	The number of monitor downtime period units during the quarter due to other known reasons.	0 - 999,999
INMD		Number of Incidents of Monitor Downtime	The total number of quarterly incidents of monitor downtime.	0 - 999

Compliance Monitoring Strategy - CMS Record
This record captures information related to compliance monitoring activities.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
CMSC	Source Category	A one character code that indicates the source category to which a facility subject to CMS belongs.	**A** Title V Major; **S** 80% Synthetic Minor; **M** Mega-Site; **O** Other
CMSI	CMS Min Frequency Indicator	A one digit field indicating the number of years allowable between full compliance evaluations.	1 – 9
CMYA	Fiscal Year of FCE A	A four digit year indicating the year that a full compliance evaluation has been scheduled as defined in the CMS plan. There are 5 occurrences.	Valid Year >= 2002
CMOA	On Site Visit Indicator A	A 1 character flag indicating if an on-site visit is planned for a given fiscal year. Default value is 'Y'. There are 5 occurrences.	**Y** – An On-site visit is planned; **N** – An On-site visit is Not planned
CMYB	Fiscal Year of FCE B	A four digit year indicating the year that a full compliance evaluation has been scheduled as defined in the CMS plan. There are 5 occurrences.	Valid Year >= 2002
CMOB	On Site Visit Indicator B	A 1 character flag indicating if an on-site visit is planned for a given fiscal year. Default value is 'Y'. There are 5 occurrences.	**Y** – An On-site visit is planned; **N** – An On-site visit is Not planned
CMYC	Fiscal Year of FCE C	A four digit year indicating the year that a full compliance evaluation has been scheduled as defined in the CMS plan. There are 5 occurrences.	Valid Year >= 2002
CMOC	On Site Visit Indicator C	A 1 character flag indicating if an on-site visit is planned for a given fiscal year. Default value is 'Y'. There are 5 occurrences.	**Y** – An On-site visit is planned; **N** – An On-site visit is Not planned
CMYD	Fiscal Year of FCE D	A four digit year indicating the year that a full compliance evaluation has been scheduled as defined in the CMS plan. There are 5 occurrences.	Valid Year >= 2002
CMOD	On Site Visit Indicator D	A 1 character flag indicating if an on-site visit is planned for a given fiscal year. Default value is 'Y'. There are 5 occurrences.	**Y** – An On-site visit is planned; **N** – An On-site visit is Not planned
CMYE	Fiscal Year of FCE E	A four digit year indicating the year that a full compliance evaluation has been scheduled as defined in the CMS plan. There are 5 occurrences.	Valid Year >= 2002
CMOE	On Site Visit Indicator E	A 1 character flag indicating if an on-site visit is planned for a given fiscal year. Default value is 'Y'. There are 5 occurrences.	**Y** – An On-site visit is planned; **N** – An On-site visit is Not planned
CM19	CMS Comment	an optional field which permits the user to enter additional information for the plant CMS record. Comments consist of one lines, which can hold 39 characters.	

Comment Record

If the comment is against the whole plant then an action # is NOT needed. However, if the comment is for a specific action, then all fields are necessary.

Data Element Acronym	Data Element Name	Description	Valid Values
STTE	State Code	a two-character FIPS code identifying the state/territory in which a plant is located.	The FIPS code entered must exist on the FIPS code table. Refer to the UI Cross Reference tables or the AFS Database for a complete listing.
CNTY	County Code	a three character FIPS code which identifies the county in which a plant is located and the county in which the office or business of the contractor responsible for asbestos Demo/Reno work is located.	The county code must exist on the county / city table.
PCDS	Plant ID	a five character plant identifier required to assign compliance information to plants in the AIRS facility subsystem. Formerly called CDS Plant ID.	This ID is unique within a state county. It may contain alpha and numeric values.
ANU1	Action Number	A three digit numeric action identifier.	Numeric values between 1 and 999; input values of 999 will generate the next available sequential action number.
CNU1	Comment Number	a three-digit numeric comment identifier.	0 - 999; input values of 999 will generate the next available sequential action comment number.
COM1	Comment	an optional field which permits the user to enter additional information for an action. Comments consist of four lines, each of which can hold 55, 57, 57 and 57 characters respectively.	

TABLE 1
SUMMARY OF NATIONAL MINIMUM DATA REQUIREMENTS (MDRs)
FOR CLEAN AIR ACT STATIONARY SOURCE COMPLIANCE

Note: Unless otherwise noted, both Regions and states/locals report their data. The reportable universe of facilities for AFS includes: Major, Synthetic Minor and Part 61 NESHAP Minor facilities, other facilities identified within the CMS Evaluation Plan, any facility with a formal enforcement action and any facility with an active HPV. Facilities with formal enforcement actions (administrative orders, consent decrees, civil or criminal referrals and actions) should be tracked in AFS until the resolution of the violation, regardless of classification. If a minor source is included in the CMS universe, has a current enforcement action of <3 years old, or is listed as a discretionary HPV, it is considered reportable to AFS. Individual regional/state agreements are not superseded by this listing.

Identification	**AFS Acronym**
1. Facility Name	PNME
2. State	STAB/STTE
3. County	CNTY
4. Facility Number	PCDS
5. Street	STRS
6. City	CYNM
7. Zip Code	ZIPC
8. SIC or NAICS Code	SIC1/NIC1
9. Government Ownership	GOVT
10. HPV Linkage and Key Action (Day Zero)	Linked from Action Data
Compliance Monitoring Strategy (CMS)	
11. CMS Source Category	CMSC
12. CMS Minimum Frequency Indicator	CMSI

Note: Generally EPA enters these fields into AFS; state/locals provide this information per agreement with the EPA Region. An EPA Region may delegate data entry rights to a state/local agency.

All Regulated Air Program(s) [Note: All applicable air programs should be reflected at the plant level of AFS.]	
13. Air Program	APC1
14. Operating Status	AST1
15. Subparts for NSPS, NESHAP and MACT	SPT1

Note: Any applicable subpart for the NSPS, NESHAP or MACT air program at major and synthetic minor sources, minor source NESHAP and all other facilities reported as MDR. Reporting of minor source NSPS and MACT subparts are optional but recommended.

Regulated Pollutant(s) within Air Program(s)	
16. Pollutant(s) by Code or Chemical Abstract Service Number	PLAP/CAPP
17. Classification(s): EPA/ST	ECLP/SCLP
18. Attainment Status: EPA/ST	EATN/SATN
19. Compliance Status: EPA/ST	ECAP/SCAP

Actions Within Air Programs (includes Action Number, Type, Date Achieved)

20. Minimum Reportable Actions:

- Informal Enforcement Actions: Notice of Violation(s)
- Formal Enforcement Actions: Administrative Order(s) and Assessed Penalties, Consent Decrees and Agreements, Civil and Criminal Referrals, Civil and Criminal Actions
- HPV Violation Discovered: Linked actions are FCEs, PCEs, Stack Tests (Observed or Reviewed), Title V Annual Compliance Certifications, Stack Test Notification Receipt
- HPV Addressing Actions: Linked actions include but are not limited to State/EPA Civil or Criminal Referrals, State/EPA Civil or Criminal Actions, Administrative Orders, Consent Decrees, Source Returned to Compliance by State/EPA with no Further Action Required.
- HPV Resolving Actions: Linked actions include but are not limited to Violation Resolved, Closeout Memo Issued, Source Returned to Compliance by State/EPA with no Further Action Required.
- Full Compliance Evaluations (On or Off Site)
- Stack Tests: Pass/Fail/Pending codes (PP/FF/99) are reported in the results code field, pending codes must be updated within 120 days.
- Title V Annual Compliance Certification Due/Received: Reported by EPA unless otherwise negotiated. The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the "Title V Annual Compliance Certification Due/Received by EPA" action, and is not enforcement sensitive.
- Title V Annual Compliance Certification Reviewed: Includes Results Codes for Annual Compliance Certification reviews: in compliance (MC), in violation (MV) and unknown (MU). Annual Compliance Certification deviations(s) will be indicated in RD08 for EPA reviews (and state reviews as negotiated).
- Investigations: EPA Investigation Initiated (started) and State/EPA Investigation Conducted (finished). State Investigation Initiated is added for optional use. EPA and State Investigation Initiated (started) action types are enforcement sensitive.

Additional Action Information:

21. Results Code RSC1

Note: Pass/Fail/Pending (PP/FF/99) codes are reported for Stack Test actions. Compliance Results Codes of "In Compliance (MC), In Violation (MV), or Unknown (MU)" are entered for Title V Annual Compliance Certification reviews.

22. RD08 (Certification Deviations) RD81

Note: EPA reports into AFS unless otherwise negotiated. Compliance Codes of "In Compliance (MC), In Violation (MV), or Unknown (MU)" are entered for Title V Annual Compliance Certification reviews.

23. Date Scheduled DTS1

Note: The Due Date of a Title V Annual Compliance Certification will be reported as Date Scheduled on the "Title V Annual Compliance Certification Due/Received by EPA" action, and is not enforcement sensitive.

24. HPV Violation Type Code(s) VTP1

Note: To be identified when the Day Zero action is established.

25. HPV Violating Pollutant(s) VPL1

Note: To be identified when the Day Zero action is established.

Timeliness Standard

26. Action Reported within 60 Days of Event reported in the Date Achieved (DTA1) field of the action record for state and local agencies, with a minimum upload of six (6) times per year. Monthly updating is encouraged. Federal Data is to be reported on a monthly basis.

OPTIONAL/DISCRETIONARY DATA REPORTING TO AFS: NON-MDR DATA

The following items cover data that is not considered an MDR, but will be useful and helpful for program implementation, evaluation and oversight. State and local agencies are encouraged to report the following items whenever practicable.

- Minor Facility information: For minor sources that are not MDR (MDR for minor facilities is defined as: Minor NESHAP, a minor facility identified within the CMS plan for evaluation, minor facilities with an enforcement action <3 years old, or any HPV case regardless of class) reporting is optional but encouraged. Minor source information would include NSPS and MACT subpart applicability.

- Stack Test Pollutant (PLC1)

- Partial Compliance Evaluations (PCEs) and specific reporting of On-Site PCE activity defined as: Complaint Partial Compliance Evaluation, Permit Partial Compliance Evaluation, Process Partial Compliance Evaluation, Partial Compliance Evaluation On-Site Observation. (Note: All PCEs are required to be reported by EPA Regional offices. Also, any negotiated PCEs that are part of an alternative frequency which is part of an agency's CMS plan are required to be reported.)

- Reporting more frequently than every 60 days.

- State Investigations initiated (Enforcement Sensitive).

- Title V Permit Program Data Elements (PPDEs): Required for reporting to AFS by the Office of Air Quality Planning and Standards (OAQPS), used by the Office of Enforcement and Compliance Assurance (OECA) for major source universe population. To be established when the Title V permit is issued. AFS will require the establishment of an AFS ID, the individual permit number, category, and event type for permit issued plus the date achieved. Permit Program Data Elements (PPDEs) include the Permit Number (ASPN), Permit Category (PMTC), and Permit Issuance Event Types (IF-Permit Issued and IR-Permit Renewal) and the date (PATY/PDEA).