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SRF Project Update and Key Findings

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AFS National Meeting

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SRF UPDATE

- A bit more than halfway done with first round of reviews
- Current HQ Activities:
 - Continue to review draft reports to improve consistency
 - Working to improve HQ turnaround time
 - Identifying Best Practices
 - Start analyzing data, e.g.,
 - Common issues
 - Common recommendations
 - Preparing for program evaluation in FY08

Guide to SRF Reports

- Last fall, OECA reviewed all draft SRF reports and identified a number of areas where OECA was consistently asking for more information to be included in the reports. The Guide addresses these common information needs.
- OC has just distributed a Guide to Writing SRF Reports to Regional SRF contacts
- Purpose of Guide is to improve efficiency of the SRF process by:
 - improving the quality of analysis in the draft reports,
 - reducing the volume of OECA comments on draft reports,
 - reducing the turnaround time of OECA reviews.

Results of Regional Survey

- **What is working --success stories?**
 - Across the regions there was a general sense that SRF:
 - helped identify significant problems;
 - will lead to improvements in state programs;
 - improved regional understanding of state programs; and,
 - led to constructive communications with the states.
 - National approach; consistency across states and comparison to national benchmarks
 - States were more open to regional oversight because they knew other states were being held to the same standard
 - States liked that ECOS and EPA were partnering on this effort – made the states willing partners
- **What is not working/key challenges?**
 - Having a structured process is helpful but, overall, the process is confusing because of the number of steps/volume of guidance
 - Certain aspects of process singled out as needing improvement:
 - HQ reviews take too long
 - Data metrics – description and purpose of metrics can be better explained
 - Defining the universe
 - File review worksheets
 - Still confusion on how to meld with CMS
 - Need a better plan for how to handle independent local agencies

Results of Regional Survey (Cont.)

- What project improvements can be suggested?
 - Several suggestions for making changes to focus or scope. For example,
 - conducting less intensive reviews where programs are known to perform well in order to do more frequent or more extensive reviews of problem areas;
 - include new emerging areas/priorities not just traditional core, e.g., focus on CAFOs in regions where they are the more significant CWA issue
 - Metrics: differentiate among metrics, not all are equally important or useful
 - Recommendations: differentiate among recommendations, some may be high priority, others may be simply suggestions. “deficiencies” vs. “enhancements”
 - Arrange forums/workgroups for program reviewers for more collaboration and exchange of ideas (and in specific media areas across regions to hear successes/issues and to ask questions)
 - Talk with other NPMs to see where they intersect and overlap

Importance of Data in SRF

- The data metrics are the key feature of SRF that ensures a consistent approach across Regions, states and locals.
- As originally designed, SRF should allow the Region to quickly assess state/local performance through data indicators.
- Provide easy “self-check” by states/locals throughout the year
- To the extent that data flow problems exist, it becomes harder for the Region to rely on data metrics to monitor performance.
- States/locals with consistently good data flow and performance should receive less oversight, and less frequent SRF “full” reviews.
- When data quality stands in the way of the review, the Regions need to work with the state/locals to develop action items that will lead to quality information.

How should data metrics be used?

- OECA has distributed a “Preliminary Data Analysis” format for initiating reviews.
 - Posted on OTIS SRF site
- The Region should provide a letter to the state/local in advance of the review including:
 - Data metric pulls with “extra columns” for states/locals to note discrepancies
 - Preliminary analysis of program based on the data
 - Files that will be reviewed and reasons (random and possibly additional “targeted” files if issues are found)
- The state/local should review the data and analysis, and reply back in regard to the information used in the review – citing specific metric “discrepancies” that are discovered.
 - A discrepancy would be when the state/local database provides a much different answer than the SRF pull, e.g., $\geq 10\%$.

Preliminary Data Analysis

- PDA format was suggested for reviews in 2006.
- PDA format was required for 2007 reviews.
- Because the data is the starting point for reviews, it is very important that this first step be taken.
- When state/locals receive the communication with the PDA, it is critical that they respond back the Region indicating whether there is agreement with the data, or whether discrepancies exist.
- After the first round of SRF reviews, EPA is hopeful that reviews can focus attention on performance rather than significant data flow and quality problems.

Suggested SRF Activities

“Between” Reviews

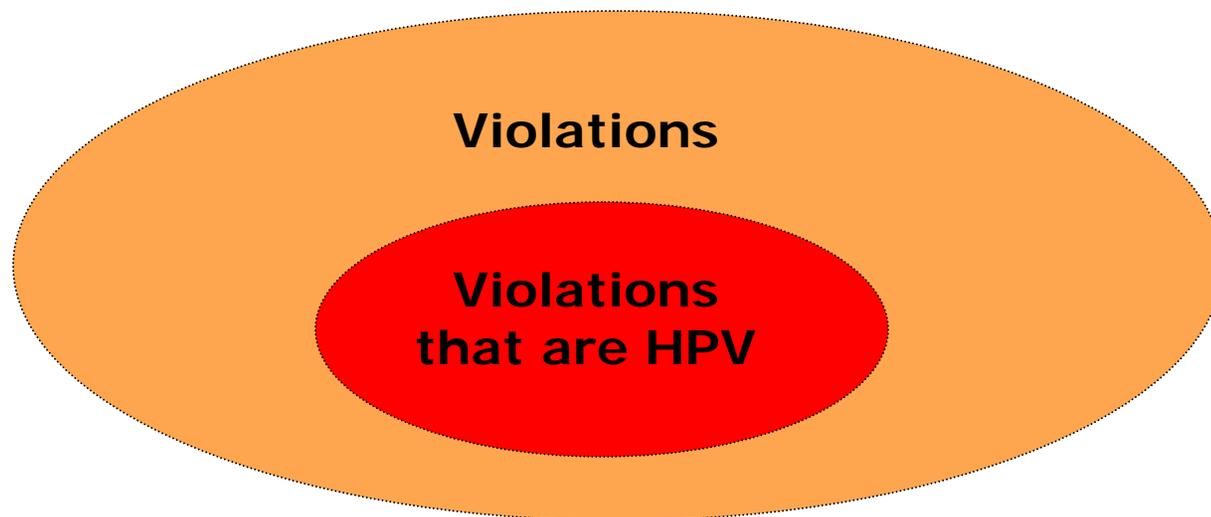
- Because OTIS has automated the data pulls for SRF, it is very simple to pull the information forward.
- The reports include a “Year to Date” selection that allow analysis of recent information.
- State/locals should consider utilizing the SRF report to ensure that the proper information continues to flow to AFS.
- Regions have the ability to view the same data, plus state comparative reports (looking across states for key issues).
- This is a quick way to make sure inspections, violations, HPVs, and actions are making it into the database.

Key Problems Identified via SRF Process

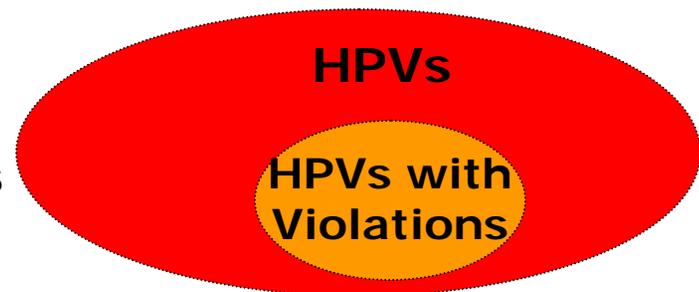
- Violation Status – A large number of states/locals are not reporting violation status:
 - Scenario 1 – HPV is reported, but there is no indication of what the violation is, e.g., compliance status.
 - Scenario 2 – Violations are evident through analysis or file review, but are not found in AFS.
 - Examples: (1) state notes a HPV or non-HPV violation in an inspection report – AFS shows facility as fully compliant (2) state reports stack test failure and compliance certification deviations, but compliance status is fully compliant.
- Facilities with HPVs should always be a subset of facilities with violations.
 - In other words, there should not be an HPV that did not have a violation.
 - There can be violations that were not HPV.
- Some states/locals are under-reporting HPV (HPVs found during file review, but not reported).

Violation Tracking - Concepts

Violations Should Be a Subset of HPVs



Example of Poor Data Flow in Some States



Example of Severity of Violation Reporting Problems Across States

Region ▼▲	State ▼▲	CAA 4C Num HPVs (1 FY) (Goal: > 0) ▼▲	CAA 11A Num HPVs / Num NC Src (1 FY) (Goal: < 100%) ▼▲
09	CA	226	1031.0%
06	LA	23	972.7%
09	AZ	17	950.0%
04	FL	36	716.7%
09	HI	8	666.7%
09	NV	5	466.7%
01	ME	11	400.0%
06	NM	1	350.0%
02	NJ	62	312.9%
07	NE	4	300.0%
06	TX	188	205.8%
08	MT	5	183.3%
08	WY	6	171.4%
05	MN	19	156.5%
05	MI	5	152.3%
10	AK	1	142.9%
01	MA	17	141.2%
01	NH	2	133.3%
10	WA	25	129.4%
08	ND	0	125.0%
01	RI	11	122.2%
10	ID	3	116.7%
04	TN	63	113.7%
05	IL	92	111.7%

04	MS	9	111.1%
10	OR	3	110.0%
07	MO	11	103.6%
05	IN	27	102.2%
04	AL	59	101.7%
08	CO	21	100.0%
07	KS	0	94.4%
03	DC	1	85.7%
08	UT	10	85.7%
03	VA	18	85.0%
03	MD	10	77.8%
03	WV	10	76.6%
01	CT	23	71.4%
05	OH	135	68.6%
06	AR	5	63.4%
06	OK	40	61.9%
04	KY	16	56.9%
04	GA	30	54.9%
01	VT	0	50.0%
04	NC	42	48.2%
03	DE	3	45.0%
02	NY	43	43.6%
03	PA	71	39.1%
04	SC	23	38.3%
07	IA	13	32.9%
05	WI	27	23.8%
02	PR	4	10.8%
02	VI	0	10.0%
08	SD	0	0.0%

Most Commonly “under-reported” HPV violations

- Synthetic Minor permit violations
 - Violation of “permit” limiting condition. Not necessary to violate major threshold
 - Violation of monitoring/recordkeeping for SM conditions
- Failed stack tests for a major pollutant
- Incorrect/Inadequate Title V ACC reporting
 - Example: known violations/deviations not reported in ACC such as failed stack test, violations issued an NOV/enforcement action or identified by FCE/PCE.
- CEM based violations (e.g., HPV Matrix violations)

Other Data Metric Findings from SRF Process

- Evaluation coverage in many states is below the national goal of 100% every 2 years for majors.
- HPV reporting has improved in many states/locals, but is still a problem in others.
 - HPVs not identified
 - HPVs not entered into AFS in a timely manner, e.g., >60days
- Facility status errors sometimes “corrupt” data metrics (examples: wrong classification or operating status)

Plans for FY08

1. SRF Evaluation 1st Quarter '08
 - Captured '06 experiences through state/local and regional surveys
 - Will solicit regional, state and local input into evaluation (kick-off Commissioner-level meeting just occurred)
2. Make adjustments/improvements 2nd Quarter '08
 - This includes reprogramming SRF web site as needed.
3. Regions begin 2nd round of evaluations
 - Regions are encouraged to return to programs with the most problems early in the cycle.