



**EPA Office of Compliance
Enforcement Targeting and Data Division**

AFS National Workshop

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Modernization Concerns and Issues

AFS 2007



The AFS Modernization Workgroup

- Recently released their final workgroup report:
 - 9 Recommendations for the Modernization of AFS;
 - Discontinue reporting of 4 fields on various records; and
 - Recommended the creation of 14 optional data fields to supplement data without increasing reporting burden; and
 - Identified 6 issues for review by EPA.



The AFS Modernization Workgroup

- EPA Members:
 - Rob Lischinsky, Compliance Monitoring, HQ
 - Ron Rutherford, Air Enforcement, HQ
 - Arnie Leriche, Public Access, HQ
 - Lisa Holscher, R5
 - Laurie Kral, R10
 - Betsy Metcalf, AFS, HQ

TEAMWORK



The AFS Modernization Workgroup

- State/Local Members:
 - Stephen Ours (DE)
 - Pat Rayne (ID)
 - Bob Waterfall & Denise Prunier (NY)
 - William Baumann & Martha Makhholm (WI)
 - Deborah Parrish (Memphis/Shelby Co, TN)
 - Chris Cote (Ventura Co, CA)
 - Ken Mangelsdorf (South Coast, CA)



Recommendations

1. Automation of the Compliance Status.
2. Air Programs and Air Program Pollutants maintained separately.
3. Clarify and streamline Compliance Status Values.
4. Create a system that can generate a Start and Stop Date for violation tracking in all cases of violation through already reported actions.



Recommendations-cont

5. Optional use of an Investigation/Enforcement Case Tracking number for violations.
6. Ability to indicate violation or meeting a compliance schedule for addressed HPV cases.
7. Compile all State or EPA Title V Annual Compliance Certifications (ACCs) into ONE TRANSACTION.



Recommendations-cont

8. Incorporate the needs identified at the 2006 AFS Workshop into all designs.
9. New Minimum Data Requirements (MDRs) are limited to the actions requiring pollutants and results codes to generate compliance/noncompliance.

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Discontinued Fields

1. Air Program Codes on actions, with the exception of stack tests and enforcement actions.
2. Relationships between Air Programs and Air Program Pollutants!! A HUGE burden reduction.
3. Air Program Pollutant Compliance Status
4. Attainment/Nonattainment Indicators



Optional Data Fields

- Latitude/Longitude
- Multiple Contact Names, Addresses, email addresses
- Permit links (URLs)
- Owner/Operator Name and Address
- Permit Emission Limits
- Historic CMS category and frequency records



Optional Data Fields--cont

- Option Fields for Air Program Tracking:
 - Applicability Date
 - Shutdown Date
 - Subpart Applicability Date
 - Subpart Shutdown Date
 - State/Local Agency Regulations
- Physical Violation Start and End Date fields
- Violation Definition



Optional Data Fields--cont

- Expansion of penalty fields:
 - Draft
 - Assessed
 - collected
 - Stipulated
 - Final
- Permit Number for ACCs
- Year of Review for ACCs



Optional Data Fields--cont

- Continuous and Intermittent Compliance Status for ACCs
- Title V Permit Data Fields:
 - Permit Number
 - Date Issued
 - Date Expires
 - Date Annual Compliance Certifications Due
 - Date of Major Modifications
 - Comment Fields for General Operating Conditions



Identified Issues

- CAA Return to Compliance versus other media
- Should SM80 become a classification value?
- Complete clarification of enforcement action definitions
- Streamlined Compliance Status Indicators:
 - In Compliance
 - Unknown-User Supplied
 - Unknown-Automatically Generated by CMS
 - In Violation
 - Compliance Monitoring-Tracking Violation, in compliance with physical requirements.



Identified Issues--cont

- Guidance on multiple TV ACCs received in a year due to late submittals, new owners, resubmission due to previous rejections.
- Guidance on reporting continuous and intermittent compliance status.

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What do you think?

- Other Recommendations?
- Other fields that should be discontinued?
- Optional Fields you would like to see in AFS?
- Issues to be reviewed before modernization?
- Review sample screens of possible compliance status generation and provide your input.

TEAMWORK



Automation of Compliance Status in a Future AFS

- The following screens present an option for automatic generation of a compliance status from action data, compiled by the AFS Compliance Managers. Using the data we currently have, this status can be generated from:
 - **RESULTS CODES**
 - **ADDED POLLUTANT CODES**
- Please review the following slides and provide your feedback.

User Reports a FULL COMPLIANCE EVALUATION (FCE)

APCs are automatically generated

User indicates **TYPE** of FCE from drop-down menu

User supplies **DATE ACHIEVED**

User supplies **RESULTS CODE**

User submits data to the database

RESULTS CODES are COMPLIANCE STATUS VALUES

In Compliance

Automatic Unknown

User-Supplied Unknown

Ongoing Emission Violations

Procedural Violations

Failure to Comply with Enforcement Obligations

Following a Schedule to Return to Compliance

If the RESULTS CODE is of Violation:

System requests **POLLUTANT(S)** by providing a draw down list

System requests **CASE NUMBER** or asks if the User wants a **Generated Case Number**

System requests **VIOLATION CODE** by providing a draw down list (optional)

System provides space for an **OPTIONAL START DATE**

System provides a date field for **FINAL COMPLIANCE DATE**

System provides a date field for **PHYSICAL COMPLIANCE (optional)**

User submits data to the database

To Return to Compliance:

Action is linked to an HPV

Action is linked to a Non-HPV

User provides a **FINAL COMPLIANCE DATE** by **CASE NUMBER** or **Generated Case Number**

User Reports a STACK TEST (Performance Test)

User supplies APCs from drop-down list	User indicates TYPE of test from drop-down menu	User supplies POLLUTANT(S) from drop-down list (optional)	User supplies DATE ACHIEVED	User supplies RESULTS CODE of In Compliance, In Violation, or PENDING	User can provide OPTIONAL PROCESS INFO and METHOD
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RESULTS CODES are:

IN COMPLIANCE

IN VIOLATION

PENDING

If the RESULTS CODE Indicates Violation:

System requests POLLUTANT(S) by providing a draw down list (if not already provided)	System requests CASE NUMBER or asks if the User wants a Generated Case Number	System requests VIOLATION CODE by providing a draw down list (optional)	System provides space for an OPTIONAL START DATE	System provides a date field for FINAL COMPLIANCE DATE	System provides a date field for PHYSICAL COMPLIANCE (optional)	System generates Compliance Status History value of: Ongoing Emissions Violation	User submits data to the database
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To Return to Compliance:

Action is linked to an HPV

Action is linked to a Non-HPV

User provides a **FINAL COMPLIANCE DATE**, **CREDIBLE EVIDENCE**, or **RETEST** by **CASE NUMBER** or **Generated Case Number**

Compliance Status History

SOURCE INFORMATION: Address, City, ST, ZIP, Class, CMS, HPV, Other High Level Info

OVERALL COMPLIANCE STATUS:
Violation Due to:

Activity

Pollutant(s)

Compliance Status

History Consists Of:

