National Strategy Regional Oversight Plan
Region 6 - Arkansas
Date 03/30/15

State	Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
AR	Air RCRA	No significant issues	N/A
AR	Water	Inadequate penalty documentation for methodology used for economic benefit and gravity. Economic benefit for delayed or avoided costs is not routinely being recovered or documented.	• This issue has been elevated to the State Senior Management level. • ADEQ states that their penalty policy is consistent with the requirements of Regulations 7 of the Arkansas Pollution Control and Ecology Commission. Any changes to this process will require a legislative change. • SRF and Annual Data Metrics will be a standing item on the Quarterly Enforcement Manager's Meetings.
AR	Water	State has not finalized/submitted an update Enforcement Management System (EMS) with described enforcement and penalty assessment processes.	• This issue has been elevated to the State Senior Management level. • Per grant workplan, state EMS is to be submitted by July 18, 2015.

National Strategy Regional Oversight Plan
Region 6 - Louisiana
Date 03/30/15

State	Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
LA	Air RCRA Water	Timeliness of HPV/SNC determinations is delayed due to State statutory process which requires signature at the Assistant Secretary level.	• This issue has been elevated to the State Senior Management level. • The State is implementing the process set by the State Legislature, and any changes to this process will require a legislative change.
LA	Air	"Timely and Appropriate" requirements for enforcement resolution are not being met. As cases are developed, LDEQ will roll additional violations into existing cases making cases more complex and difficult to settle.	• This issue has been discussed with LDEQ managers. • LDEQ has stated it will have a "cut off" date to stop rolling additional violations into cases which should resolve the issue.
LA	Water	Inadequate documenting of penalties, and failure to be timely and appropriate due to huge universe of minors (e.g., overabundance of permitted small package plants). Penalty appeals process does not have clearly defined timeframes so cases frequently collect no penalties for months; compliance schedules are extended.	• This issue has been elevated to the State Senior Management level. • The State has indicated this is a resource issue.

National Strategy Regional Oversight Plan
Region 6 – New Mexico
Date 03/30/15

State	Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
NM	RCRA	No significant issues	N/A
NM	Air	State is not meeting the CMS FCE coverage goal, and Title V ACCs goal.	• These issues have been elevated to the State Senior Management level. • While still not meeting the Title V ACCs goal, the state has shown improvement since the last SRF Review. • The State has indicated this is a resource issue which they are trying to resolve.
NM	Water	New Mexico is a Direct Implementation State – See OECAs plan for further information	N/A

National Strategy Regional Oversight Plan
Region 6 – Oklahoma
Date 03/30/15

STATE	PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
OK	Air	ODEQ process causes delays to the designation of an HPV, preparation of case management plans and ability to address violation(s). As a result, the HPVs are not addressed timely with an appropriate enforcement action as required by the HPV policy.	• This issue has been elevated to the State Senior Management level. • ODEQ has stated it will continue following its internal policy to identify HPVs. • R6 has discussed with the state and ODEQ has indicated that having a Case Specific Management Plan by Day 225 can be achieved per the revised HPV Policy. • It is hoped this will address the issue.
OK	RCRA	No significant issues	• None
OK	Water	Data completeness and accuracy (missing inspections and enforcement data for minor permittees missing from ICIS.	• This issue has been elevated to the State Senior Management level. • SRF and Annual Data Metrics will be a standing item on the Quarterly Enforcement Manager's Meetings. • State has indicated this is a resource issue.

National Strategy Regional Oversight Plan
Region 6 – Texas
Date 03/30/15

STATE	PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
TX	Air Water Drinking Water	Timeliness of HPV/SNC determinations is delayed due to the combinations of two factors: 1) the allowable timeframe for the enforcement process is set by Texas legislation, which allows a maximum timeframe of 255 days, and 2) the current process requires that administrative orders be approved by three State Commissioners. The Commissioner meeting agendas are limited due to high volume, causing delays to the process for enforcement issuance. The organizational structure, workload, and internal processes dictate the ultimate timelines.	• This issue has been elevated to the State Senior Management level. • The State is implementing the program set by the Texas Legislature. The State has indicated that changes to this process will require a legislative change for the allowable timeframe, as well as internal process changes.
TX	Air	Data completeness and accuracy. State's data was extracted from TCEQ's system and sent to AFS, but the upload had errors. State worked to resolve issues, but missed the AFS cut-off date.	• This issue has been discussed at the State Senior Management level. • Texas expects to start submitting data electronically to ICIS-Air in March. The Region will continue oversight to ensure resolution. • This should address this issue.
TX	RCRA	Data completeness and accuracy.	• This issue has been discussed at the State Senior Management level. • State is committed to make necessary changes, however, difficulties with uploads from state's CCEDS state system to National databases is perpetuated by changes and upgrades to National databases. • State is working to address this issue.