National Strategy Regional Oversight Plan
Region 6 - Arkansas
Date 02/26/16

State	Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
AR	Air	Round 3 SRF Final Report issued January 21, 2016 identified areas of improvement in three CAA Elements based on FY2013 data from AFS: • Data – Inaccurate MDR data in AFS • Inspections – Inadequate documentation in FCE reports to determine compliance • Enforcement – Untimely action to address HPVs	• Data could not be corrected in AFS due to shutdown in October, 2014; ADEQ changed data in ICIS-Air where possible. ADEQ will provide updated written guidelines by March 21, 2016. • ADEQ will provide a current Inspection Report Template by July 21, 2016 • ADEQ will provide current enforcement practices and guidelines by July 21, 2016
AR	RCRA	No significant issues	
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 is not consistently timely with it's formal Enforcement Actions.	• This issue has been elevated to the State Senior Management level.

National Strategy Regional Oversight Plan
Region 6 - Louisiana
Date 02/26/16

State	Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
LA	Air 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. • Based on criteria in revised HPV Policy, LDEQ is identifying fewer HPVs
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	Air	FY2015 LDEQ enforcement data is not in ICIS-Air and so "Timely and Appropriate" progress cannot be determined.	• EPA HQ authorized contractor support to assist LDEQ in transferring data from the state database into ICIS-Air. • LDEQ projects having all data in ICIS-Air production by end of FY16.
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.

LA	RCRA	FY2015 data indicates an SNC identification rate lower than national average, however file review indicates proper SNC determinations.	• Not a significant issue, but an area for attention.

National Strategy Regional Oversight Plan
Region 6 – New Mexico
Date 02/26/16

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. • Region 6 approved an alternative CMS Plan for FY15 which schedules facilities most overdue for an FCE to be inspected in FY16, and projects elimination of backlog by FY2020.
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 02/26/16

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. • Based on criteria in revised HPV Policy, ODEQ is identifying fewer HPVs • The Region will continue its oversight.
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 02/26/16

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. • Based on criteria in revised HPV Policy, TCEQ is identifying fewer HPVs
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. Region 6 and OECA have been working with TCEQ program and IT staff on development of customized code to upload all state data into ICIS-Air.	• This issue has been discussed at the State Senior Management level. • Texas is submitting compliance monitoring data electronically to ICIS-Air Production. Texas is sending enforcement data to ICIS-Air Test but there are still issues. • TCEQ projects being able to send enforcement data to ICIS-Air Production by April 30, 2016 • The Region will continue its oversight to ensure resolution.
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.