State Review Framework Oversight Plan

EPA Region 6

March 31, 2014

The Compliance Assurance and Enforcement Division in EPA Region 6 are committed to strong professional relationships with our State agencies. These relationships have been critical to achieving our programmatic goals and we invest heavily in maintaining strong state partnerships. We hold regular, face-to-face meetings with state enforcement directors and management officials, and our program staff conducts monthly meetings with state counterparts to coordinate inspection and enforcement priorities and issues. State Review Framework and Annual Data Metrics are routine agenda items for our meetings with State management officials.

Given recent resource reductions, including the loss of eight staff as part of the VERA/VSIP process, we plan to focus on key priorities in each program. Our air enforcement program will focus resources on compliance issues that adversely impact our fence-line communities. Similarly, our RCRA enforcement program will prioritize facilities that are skirting requirements and thereby affecting communities. And our water enforcement program will continue to work with our state partners to ensure that all public water supply systems provide drinking water consistent with national drinking water standards.

Our relationship with states are even more important in the face of federal and state budget limitations, so we will continue to invest in maintaining strong state partnerships. The attached State Program Health Plans are excerpted from the last SRF report for the State and these items will be part of our ongoing dialogue with the States.

Region 6 State Program Health Plan

Oklahoma

March 31, 2014

PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA	• Element 3: HPV data entry, although consistent with DEQ policy, was not always timely per the HPV Policy. • Element 8: HPVs were accurately identified, however, not always entered into AFS timely. • Element 10: not all enforcement actions met EPA timeliness criteria	EPA Region 6 will meet with ODEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
CWA	• Element 1: some inspection and enforcement data for non-major permittees were missing from ICIS.	EPA Region 6 will meet with ODEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
RCRA	• Element 3: not all data were entered timely • Element 10: not all enforcement actions met EPA timeliness criteria	EPA Region 6 will meet with ODEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.

Region 6 State Program Health Plan

Arkansas

March 31, 2014

PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA	• ADEQ identifies high priority violators (HPVs), but data entry does not meet program requirements. • The Department does not meet the enforcement timeliness criteria for responding to HPVs.	EPA Region 6 will meet with ADEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
CWA	• Penalty documentation did not contain adequate information on the methodology behind the penalty calculations for economic benefit and gravity. Economic benefit for delayed or avoided costs is not routinely being recovered or documented.	EPA Region 6 will meet with ADEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
RCRA	• No significant issues identified	EPA Region 6 will meet with ADEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.

Region 6 State Program Health Plan

Texas

March 31, 2014

PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA	• Data Completeness – Synthetic Minors – SM 80 • Inspection Coverage	EPA Region 6 will meet with TCEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
CWA	• Data Accuracy: Accuracy of Minimum Data Requirements • Identification of Alleged Violations • Identification of SNC and HPV	EPA Region 6 will meet with TCEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
RCRA	• Data Completeness • Data Accuracy	EPA Region 6 will meet with TCEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.

Region 6 State Program Health Plan

New Mexico

March 31, 2014

PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA	• Compliance monitoring and enforcement related data quality and timeliness • Some data issues with HPV identification	EPA Region 6 will meet with NMED leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
CWA	• New Mexico is a Direct Implementation State – Please see OECAs plan for further information	N/A
RCRA	• Some delay in violation data entry • Some enforcement actions did not meet EPA timeliness guidelines.	EPA Region 6 will meet with NMED leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.

Region 6 State Program Health Plan

Louisiana

March 31, 2014

PROGRAM	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA	• LDEQ definition for HPV discovery and day zero do not match EPA's HPV Policy leading to data inaccuracies in the national database (Air Facilities System, AFS). • There were data timeliness issues associated with uploads into AFS, from the State's TEMPO database.	EPA Region 6 will meet with LDEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
CWA	• No significant issues identified	EPA Region 6 will meet with LDEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.
RCRA	• Instances of significant non-compliance were properly identified, but were not timely reported in the national database RCRAInfo.	EPA Region 6 will meet with LDEQ leadership periodically throughout the year. SRF and Annual Data Metrics will be a standing item on the agenda for these meetings with emphasis on making improvements prior to the next SRF review.