

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 23, 1999

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

SUBJECT: Implementing the National Performance Measures Strategy – Second Phase

FROM: Steven A. Herman /S/
Assistant Administrator

TO: Regional Administrators, Regions I-X
Deputy Regional Administrators, Regions I-X
Regional Enforcement Division Directors and Coordinators, Regions I-X

This is a follow up to my March 3, 1999 memorandum, *Implementing the National Performance Measures Strategy - First Phase* which called for collection of data for measures under the National Performance Measures Strategy (NPMS) sets 6, 7, 8, 9, and 11 during 3rd and 4th Quarters FY99. The purpose of this memorandum is to provide details on what data will be collected and reported during the second phase of NPMS implementation. This phase adds the remaining measures, NPMS sets 1, 3, 4, and 9, to the measures already being reported. I am also providing clarification on sets 6, 7, and 8 and information on the improvements to set 2, and changes to set 10, that will be made during this phase of implementation. The measures are listed below under **Second Phase Implementation**. (Further details of implementation are provided in technical attachments E through L which are only being provided to enforcement coordinators, measures leads, and NPMS Steering Committee members.) Please see Attachment A for a comprehensive schedule of NPMS measures and reporting mechanisms.

Continuing our Progress Toward Effective Measures

With the addition of Phase II measures, our Performance Profile is fully implemented. Fiscal year 2000 will be the first year that we will be reporting results for all NPMS measures to Congress for GPRA. These results will be used to analyze and interpret the effectiveness of our programs and serve as a baseline for subsequent years. Thus, the completeness and accuracy of the data reported are critical to establish accountability and serve as an accurate baseline for future reporting.

The regional measures leads will be instrumental in achieving this, through routine

communication and coordination with my staff and with one another. The Office of Compliance will host a conference call with regional measures leads in January to discuss expectations and define roles. A complete list of regional measures leads is in Attachment B.

FY 2000 will also be the first year for which we have performance measurement data for the full range of enforcement and compliance activities. This offers us new opportunities for program evaluation and management. We will increase our ability to measure the effectiveness of various individual enforcement and compliance tools, as well as strategic combinations of tools. This data will also support our efforts to evaluate and integrate tools as part of the September 9, 1999 OECA Action Plan for Innovation.

The addition of several outcome measures will enable us to demonstrate the impact that our programs have on increasing compliance and improving the environment. It will allow us to link program activities (outputs) to results (outcomes).

Integration of Performance Measures

The Performance Profile includes measures which encompass our most important program activities. It serves as a framework, or “menu”, from which to choose the most appropriate measures for the activities and initiatives we undertake. For example, the measures selected for the 2000 MOA priorities and the Sector Strategies are subsets of NPMS that were tailored to the specific priority/strategy. NPMS data can also be used for specific program reviews and management discussions.

The Environmental Council of States (ECOS) Core Accountability Measures also represent a subset of the NPMS measures. We are providing assistance to our state partners so they can make progress toward using outcome measures in their enforcement and compliance assurance programs. Attachment C provides descriptions of 12 state outcome measurement projects that OECA is funding, with the corresponding NPMS outcome measures indicated.

The NPMS measures are incorporated into OECA’s FY2000 Annual Performance Plan required by GPRA. The crosswalk of the FY 2001 Performance Plan measures, the NPMS Measures, and the ECOS Core Accountability Measures illustrates the integration of our measures. (Attachment D)

Second Phase Implementation

The measures to be implemented in the second phase are listed below and described in the referenced attachments:

- Statistically Valid Noncompliance Rates for Selected Populations (Set #1), Attachment E
- Improvements Resulting from Compliance Assistance (Set #3), Attachment F
- Improvements Resulting from Integrated Initiatives (Set #4), Attachment G
- Self-Policing Efforts by Using Compliance Incentive Policies (Set #9), Attachment H

Additional information and clarification:

- NPMS Sets 6 and 7: *Average Duration of Time for Significant Violators to Return to Compliance and Percentage of Significant Violators with Recurrent Significant Noncompliance Within a 2 Year Period.* There is no new reporting being required for these sets. However, clarification is provided in Attachment I on modification in the definitions and use of the data.
- NPMS Set 8: Clarification on the definitions of investigations is being provided in Attachment J as a result of questions from the March 3, 1999 memo and guidance.
- Other changes in Set #8 Measures:

For Set #8, *Monitoring Compliance*, we will not collect data for the output measure for record reviews for the following reasons: a) Regions conduct record reviews using a wide variety of methods b) Regions conduct different types and numbers of record reviews, and c) record reviews are generally not a major Regional compliance monitoring activity.

A new outcome measure for the environmental effectiveness and deterrent effect of performing environmental compliance inspections is being implemented by Region II on a pilot basis. Examples of compliance inspection outcomes include changes in materials handling, instituting best management practices, establishment of waste minimization practices, and early correction of potential violations. This is not a mandatory measure and will not be used for GPRA reporting. However, we believe this information can be valuable in demonstrating the results of our inspection activities and encourage Region II to share their results with other regions who may be interested. More information is available in Attachment K.

- NPMS Set 2: *Environmental and Human Health Improvements from Enforcement*

The Office of Compliance has developed an implementation plan for improvements to NPMS Set 2, *Improvements from Enforcement*, based on a review and analysis provided by a contractor. The plan details system changes, reporting requirements, or other activities to be implemented in 2000.

Implementation of the plan is contingent on available resources.

• NPMS Set 10: *Facilities/Entities Reached Through Compliance Assistance Tools and Initiatives or Information*

In FY99, four regions piloted the use of a Lotus-Notes database, Reporting Compliance Assistance Tracking System (RCATS) for tracking compliance assistance outputs. Based on the success of the pilots (over 150 regional users), RCATS will replace all manual reporting of compliance assistance activities for regional and Headquarters programs. RCATS will be available in each region for reporting on January 10, 2000. A list of RCATS contacts in each region can be found in Attachment L. General information about Set 10 can be found in Attachment F.

Conclusion

Full implementation of the NPMS Performance Profile offers exciting opportunities for program evaluation and challenges us to use the information innovatively to improve the way we manage our programs. Integration of the NPMS measures with the Annual Performance Plan, state activities, and MOA, sector strategy, and other initiatives, enhance our ability to measure and manage our enforcement and compliance activities as an integrated national program.

I ask that you ensure full participation of your Region in the implementation of these performance measures. I encourage you, your managers and your staff to utilize the data to improve the efficiency and effectiveness of our programs.

If you have any questions about implementation or about the National Performance Measures Strategy, please call Michael Stahl at (202) 564-2280.

Attachments:

Attachments A - D contain general information and are being provided to all addressees.

Attachments E - L contain technical information and are only being provided to enforcement coordinators, measures leads, and NPMS Steering Committee members.

- A Complete NPMS Implementation Schedule with Reporting Mechanisms
- B List of Regional Measures Leads
- C State Outcome Measurement Projects
- D FY 2000 Measures Crosswalk
- E NPMS Set 1 - Noncompliance Rates
- F NPMS Sets 3, 10 - Compliance Assistance
- G NPMS Set 4 - MOA priority measures
- H NPMS Sets 5, 9 - Self Policing Efforts
- I NPMS Sets 6, 7 - Clarification for Reporting of Significant Violators

- J NPMS Set 8 - Clarification of Definitions of Investigations
- K NPMS Set 8 - Outcomes from Compliance Monitoring - Inspection Conclusion Data
- L List of Regional Contacts for Reporting Compliance Assistance Tracking System (RCATS)

- cc: Regional Counsels, Regions I-X
 - Sylvia Lowrance
 - OECA Office Directors, Deputy/Associate Office Directors
 - ORE Division Directors, Deputy/Associate Division Directors
 - OC Division Directors, Deputy/Associate Division Directors
 - NPMS Measures Leads
 - NPMS Implementation Steering Committee
 - Regional Measures Contacts
 - Dennis Devoe
 - Jack Neylan
- cc: Rita Smith
 - Dave Ziegele
 - Jane Henriques
 - Marie Muller
 - Bob Tolpa

Attachment A

NPMS Implementation Time Table 11/99

PHASE I Implementation - For 3rd and 4th Qtr FY 1999 Activity			
NPMS	Measure to be Reported	None, All or Some, New Reporting	Reporting Mechanism
Set 6	Average Duration of Time for Significant Violators to Return to Compliance	None	PCS, AFS RCRIS
Set 7	Percentage of Significant Violators with Recurrent Significant Noncompliance Within a 2 Year Period	None	PCS, AFS RCRIS
Set 8	Number of Investigations Conducted	All	Manual
Set 8	Tracking Citizen Complaints	All	Manual
Set 9	Number of Notices of Violation by Media	Some	PCS, AIRS SDWIS RCRIS, NCDB
Set 11	Capacity Building Efforts Provided to State, Local, or Tribal Programs	All	Manual

PHASE II Implementation - For FY 2000 Reporting		
NPM S	Measure to be Reported	Reporting Mechanism
Set 1	Statistically Valid Compliance Rates for Selected Regulated Populations	PCS, AFS, RCRIS
Set 3	Improvements Resulting from Compliance Assistance	RCATS or Manual
Set 4	Improvements Resulting from Integrated Initiatives	*Various
Set 9	Self-Policing Settlements Concluded	Docket

FY 2000 Improvements to Measures Already Being Used		
NPMS	Measures	Reporting Mechanism
Set 2	Environmental and Human Health Improvements from Enforcement	Docket
Set 5	Self-Policing Efforts by Using Compliance Incentive Policies	Docket
Set 10	Facilities/Entities Reached Through Compliance Assistance	RCATS

Set 8 - Manual reporting of Inspection Conclusion Data will be optional in FY 2000. Record Reviews will not be collected for NPMS.

No collection or reporting changes:

Set 8 Number of Inspections Conducted

Set 9 Number of Civil and Criminal Cases Initiated and Concluded

* Data being used for this measure was requested in the 6/1/99 Memorandum from Elaine Stanley and Eric Schaeffer to Regions entitled *Proposed Performance Measures for FY 2000/2001 OECA MOA Priorities and Sector Strategies*.

Attachment B

Regional Measures Leads

11/99

Region 1:	Michael Mahoney
Region 2:	Dit Cheung
Region 3:	Garth Connor
Region 4:	David Abbott
Region 5:	Linda Mangrum
Region 6:	Rob Lowrance
Region 7:	Diane Callier
Region 8:	Judy Heckman Prouty
Region 9:	Jim Grove
Region 10:	Betty Wiese

Attachment C

Compliance Measurement Cooperative Agreements

OECA is awarding \$1.8 million in Cooperative Agreements for states to develop and implement outcome based performance measures for enforcement and compliance assurance programs.

The projects selected cover a wide range of activities that will allow the pilot states to demonstrate outcomes from their activities while serving as models for other states. The following 12 projects will be funded:

Wisconsin DNR, Bureau of Air Management - Compliance with Title V Certification The Air Management Program will examine the accuracy of Title V compliance through self-certification by doing a quantitative comparison of statistically valid compliance rates from self-certification and statistically valid compliance rates from inspections. (NPMS Set 1)

Washington Department of Ecology - Effects of Enforcement and Technical Assistance on Risk Based Compliance Indicator WA will use its recently developed *Regulatory Compliance Indicator* (RCI) which is a reflection of whether or not a facility is in compliance with “highest risk” hazardous waste regulatory requirements recorded in the RCRIS database. The analysis will examine how formal and informal enforcement and technical assistance impact the RCI. (NPMS Sets 2, 3)

Oregon DEQ - Deterrent Effect of Enforcement Quantitatively evaluate specific deterrence by comparing such data elements as penalty amounts to recidivism, and qualitatively evaluate the general effects of deterrence through surveys and interviews with the regulated community. (NPMS Set 2)

Missouri DNR - Improvements from Enforcement Adapt the Case Conclusion Data Sheet to provide environmental impact data from all state enforcement actions.(NPMS Set 2)

Texas TNRCC/Small Business & Environmental Assistance Division - Measuring Outcomes from Compliance Assistance Use OECA’s *Guide for Measuring Compliance Assistance Outcomes* to measure behavioral changes, environmental and human health improvements, and awareness and understanding of environmental regulatory issues as a results of technical assistance for small businesses. (NPMS Set 3)

Connecticut DEP/Small Business Assistance Program - Compliance Management Strategy for General Permit Program Develop a statistically valid baseline noncompliance rate for compliance with general permits then determine effects of compliance assistance and enforcement initiatives on the noncompliance rate. (NPMS Sets 1,2, & 3)

California Air Resources Board - Effect of Assistance on Compliance with Chrome Plating Rule

Attachment C, Page 2

Determine statistically valid baseline noncompliance rate for chrome plating rule and then examine the effect of compliance assistance on the noncompliance rate. (NPMS Sets 1 & 3)

New Hampshire DES - Effectiveness of a “Partial-Inspection” Strategy Employs a “partial-inspection” strategy which significantly increases the number of inspections by reducing the time spent at each facility, targets inspections based on risk, and focuses on compliance with direct waste handling requirements. Develops and compares the noncompliance rates, environmental and human health improvements, and SNC rates for facilities in this strategy to facilities receiving either compliance assistance or regular compliance inspections. (NPMS Sets 1, 2 & 3)

New Hampshire DES - Compliance Assistance Metrics Software Development of software for tracking results of environmental compliance assistance and pollution prevention. Software will be shared among States in the Northeast (EPA Region 1) and will be available for other states. (NPMS Set 3)

Maryland DE - Statistically Valid Noncompliance Rates Development of methodology for statistically valid noncompliance rates. This is part of a state-wide environmental measurement effort which includes 8 outcomes of which 4 are indicators, including measures on exceedences of air quality standards, criteria pollutants, ozone standards and emissions. (NPMS Set 1)

Indiana DEM - Prototype for Sector Based Outcome Measurement Development of a prototype sector based multi-media model for compliance and enforcement for the auto-salvage industry. Project includes building a complete database for the industry state wide and provides compliance assistance and targeted inspections followed by measuring outcomes from each. (NPMS Sets 1-10)

Colorado DPHE - Comprehensive Enforcement and Compliance Measurement System Develop a unified, multi-media, facility-based, permanent system to collect and analyze output and outcome data from all enforcement, compliance assistance and pollution prevention activities undertaken by the agency. (NPMS Sets 1, 2, & 3)

Attachment D

2001 PERFORMANCE MEASURES CROSSWALK
ENFORCEMENT AND COMPLIANCE ASSURANCE PROGRAM

August 19, 1999

<u>FY 2001 ANNUAL PERFORMANCE PLAN</u> <ul style="list-style-type: none"> • Annual requirement of GPRA • Provides objectives, sub-objectives and associated performance goals, measures and resources 		<u>NATIONAL PERFORMANCE MEASURES STRATEGY (NPMS)</u> <ul style="list-style-type: none"> • Enhanced performance measures framework developed through stakeholder consultation • Individual measures to be implemented in FY 1999, all measures to be operational in FY 2000 	<u>FY 2000 CORE MEASURES</u> <ul style="list-style-type: none"> • Used in Performance Partnership and other agreements between individual States and EPA Regions • Used in Performance Partnership and other agreements between individual States and EPA Regions
Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<u>Goal 9 Objective 1 S-O 1:</u> APG 1: EPA will direct enforcement actions to maximize compliance and address environmental and human health problems; 75% of concluded enforcement actions will require environmental or human health improvements, such as pollutant reductions and/or changes in practices at facilities. [Congressional/Key]	(240) 35% of concluded enforcement actions identify pollutant reductions (core optional)	*Environmental or Human Health Improvements by Regulated Entities Set 2 - Improvements Resulting from EPA Enforcement Action	(1) *Environmental and/or public health benefits achieved through concluded enforcement activities e.g. case settlements, compliance agreements, injunctive relief, etc.
	(241) 600 million pounds of pollutants reduced (core optional)	*Environmental or Human Health Improvements by Regulated Entities Set 2 - Improvements Resulting from EPA Enforcement Action	(1) *Environmental and/or public health benefits achieved through concluded enforcement activities e.g. case settlements, compliance agreements, injunctive relief, etc.
	(242) Increase or maintain compliance rates or other indicators of compliance (using FY 2000 baseline) for selected regulated populations (core optional)	*Levels of Compliance in Regulated Populations Set 1 - Rates of non-compliance for fully-inspected and self-reporting populations, those targeted for special initiatives, and priority industry sectors	(2) *Rates of significant noncompliance for selected regulated populations

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
	(243) By 2005, increase by 10% the number of concluded enforcement actions that result in improvements in the use or handling of pollutants over the FY 98 baseline. (core optional)	*Environmental or Human Health Improvements by Regulated Entities Set 2 - Improvements Resulting from EPA Enforcement Action	(1) *Environmental and/or public health benefits achieved through concluded enforcement activities e.g. case settlements, compliance agreements, injunctive relief, etc.
	(244) By 2005, increase by 10% the number of concluded enforcement actions that result in improvements in facility management practices and information over the FY 98 baseline. (core optional)	*Environmental or Human Health Improvements by Regulated Entities Set 2 - Improvements Resulting from EPA Enforcement Action	(1) *Environmental and/or public health benefits achieved through concluded enforcement activities e.g. case settlements, compliance agreements, injunctive relief, etc.
	(245) Reduce by 2 percentage points the level of significant noncompliance recidivism in the Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act programs from FY 98 levels.	*Responses of Significant Violators Set 7 - Percentage of significant violators with new or recurrent significant violations within 2 yrs of receiving previous enforcement action	(3) *Percent of significant non-compliers (SNCs) that have been returned to compliance or otherwise addressed
	(246) Increase by 2 percentage points the number of facilities that return to full physical compliance in less than two years for Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act programs from the FY 98 baseline. (core required)	*Responses of Significant Violators Set 6 - Average number of days for significant violators to return to compliance or enter enforceable plans or agreements.	(3) *Percent of significant non-compliers (SNCs) that have been returned to compliance or otherwise addressed
	(145) Produce report on the number of civil and criminal enforcement actions initiated and concluded (core required)	Enforcing the Law Set 9 - No. of notices issued, civil and criminal actions initiated and concluded, and self-policing settlements concluded	(6) Enforcement actions (e.g., cases, referrals, orders, notices) taken, by media

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 9 Objective 1S-O 2:</u></p> <p>APG 2: EPA will conduct 15,000 inspections and 550 investigations targeted to areas that pose risks to human health or the environment, display patterns of non-compliance or include disproportionately exposed populations. [Congressional/Key]</p>	(248) 550 civil and criminal investigations	<p>Monitoring Compliance Set 8 - Number of inspections, record reviews, responses to citizen complaints, and investigations conducted</p>	
	(275) 15,000 EPA inspections (core required)	<p>Monitoring Compliance Set 8 - Number of inspections, record reviews, responses to citizen complaints, and investigations conducted</p>	(5) Total number of inspections conducted at major facilities, and the percentage of total universe of regulated sources inspected in negotiated priority areas (e.g., industry sectors, geographic areas)
	(247) 50% of inspections and investigations (civil and criminal) conducted in National and Regional priority areas. (core required)	<p>Monitoring Compliance Set 8 - Number of inspections, record reviews, responses to citizen complaints, and investigations conducted</p>	(5) Total number of inspections conducted at major facilities, and the percentage of total universe of regulated sources inspected in negotiated priority areas (e.g., industry sectors, geographic areas)

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 9 Objective 1 S-O 2:</u></p> <p>APG 3: Maintain and improve quality and accuracy of EPA's enforcement and compliance data to identify noncompliance and focus on human health and environmental problems. [Congressional/Key]</p>	<p>(249) Complete General Enforcement Management System (GEMS) development (programming) and begin system testing.</p>		
	<p>(250) Complete Quality Management Plan (QMP) project for 5 additional data systems</p>		
	<p>(251) Complete detailed design (development of screens, prototypes) for Permit Compliance System (PCS) system modernization</p>		
	<p>(252) Continue operation and maintenance/user support of 14 information systems housing national enforcement and compliance assurance data with less than 5% down-time.</p>		

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 9 Objective 1 S-O 2:</u></p> <p>APG 4: Improve capacity of states, localities and tribes to conduct enforcement and compliance assurance programs. EPA will provide training as well as assistance with state inspections to build capacity. [Congressional/Key]</p>	<p>(281) 100 EPA-assisted inspections to build capacity</p>	<p>Building Capacity Set 11 - Capacity building efforts provided to state, local or tribal programs</p>	
	<p>(253) 130 EPA training classes/seminars delivered to states, localities and tribes to build capacity.</p>	<p>Building Capacity Set 11 - Capacity building efforts provided to state, local or tribal programs</p>	
<p><u>Goal 9 Objective 1 S-O 3:</u></p> <p>APG 5: Ensure compliance with legal requirements for proper handling of hazardous waste imports and exports.</p>	<p>(254) EPA will review and respond to 100% of the notices for transboundary movement of hazardous wastes, ensuring their proper management in accordance with international agreements</p>		

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 9 Objective 2 S-O 1:</u></p> <p>APG 6: In FY 2001, increase opportunities through new targeted sector initiatives for industries to voluntarily self-disclose and correct violations on a corporate-wide basis. [Congressional/Key]</p>	<p>(255) By 2005 increase by 25% over FY 97 levels the number of facilities voluntarily self-disclosing and correcting violations to the Federal government (core optional)</p>	<p>*Environmental or Human Health Improvements by Regulated Entities Set 5 - Self-policing efforts by using compliance incentive policies</p>	<p>(4) *Results of using State alternative compliance approaches (e.g., audit laws or policies, XL projects) and compliance assistance</p>
<p><u>Goal 9 Objective 2 S-O 2:</u></p> <p>APG 7: Increase the regulated community's compliance with environmental requirements through their expanded use of compliance assistance. The Agency will continue to operate small business compliance assistance centers and will develop compliance assistance tools such as sector notebooks and compliance guides. [Congressional/Key]</p>	<p>(256) 50% of recipients of compliance assistance from 10 projects have improved their use or handling of pollutants or improved their facility management practices or information (core optional)</p>	<p>*Environmental or Human Health Improvements by Regulated Entities Set 3 - Improvements resulting from compliance assistance tools and initiatives</p>	<p>(4) *Results of using State alternative compliance approaches (e.g., audit laws or policies, XL projects) and compliance assistance</p>
	<p>(257) 500,000 facilities, states or technical assistance providers reached through targeted compliance assistance (core optional)</p>	<p>Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information</p>	<p>(7) Number of facilities/entities reached through each type of compliance assistance activity</p>

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
	(258) 200 compliance assistance tools developed	Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information	(7) Number of facilities/entities reached through each type of compliance assistance activity
	(259) All new EPA compliance assistance materials will be added to the Clearinghouse within 30 days of issuance	Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information	(7) Number of facilities/entities reached through each type of compliance assistance activity
<p><u>Goal 9 Objective 2 S-O 2:</u></p> <p>APG 7a: Promote the use of Environmental Management Systems (EMS) to address known compliance and performance problems.</p>	(260) Increase EMS use by developing tools, such as training and best practice manuals that encourage improved environmental performance	Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information	(7) Number of facilities/entities reached through each type of compliance assistance activity
<p><u>Goal 9 Objective 2 S-O 3:</u></p> <p>APG 8: In FY 2001, review all major proposed Federal actions under the National Environmental Policy Act (NEPA) and achieve successful mitigation for at least 70% of the adverse environmental impacts resulting from those actions. [Congressional/Key]</p>	(261) Review 325 major proposed Federal actions, i.e., Draft Environmental Impact Statements (DEIS).		
	(262) 70% of significant impacts identified by EPA are successfully mitigated		

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 9 Objective 2 S-O 3:</u></p> <p>APG 9: Review and document 100% of water treatment facility construction grants and water discharge permits subject to NEPA. [Not Congressional]</p>	<p>(263) 100% of Clean Water Act construction grant and permit NEPA obligations are met.</p>		
<p><u>Goal 7 Objective 1 S-O 2:</u></p> <p>APG 10: Improve public access to compliance and enforcement documents and data through multimedia data integration projects and other studies, analyses and communication/outreach activities. [Congressional/Key]</p>	<p>(276) 5% increase in the use of SFIP website user sessions over FY 99 levels</p>	<p>Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information</p>	
	<p>(264) By the end of FY 2001, all ten EPA Regions will have an enforcement and compliance web-site.</p>	<p>Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information</p>	
	<p>(265) EPA will make 90% of enforcement and compliance policies and guidances issued in FY 2001 available on the Internet within 30 days of issuance.</p>	<p>Providing Assistance and Information Set 10 - Facilities/entities reached through compliance assistance tools and initiatives or information</p>	
	<p>(266) By April 2001, make summaries of all FY 2000 significant cases available on the Internet.</p>		

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 7, Objective 1 S-O 3:</u></p> <p>APG 11: Ensure that EPA’s policies, programs and activities, including public meetings, address disproportionately exposed and under-represented populations issues so that no segment of the population suffers disproportionately from adverse health or environmental effects. Identify and manage “hot spots”, national EJ issues and advise the Administrator. [Congressional/Key]</p>	(277) Hold 25 EPA-sponsored public meetings in which disproportionately impacted and disadvantaged communities participate.		
	(273) Increase to 20, the number of states that have environmental justice programs	Building Capacity Set 11 - Capacity building efforts provided to state, local or tribal programs	
	(278) Respond within 60 days to 75% of requests made to each Region and AA-ship to address complaints heard during public comment period at NEJAC.		
	(274) 100 grants awarded to low income, minority communities for addressing environmental problems	Building Capacity Set 11 - Capacity building efforts provided to state, local or tribal programs	
	(279) Conduct 18 NEJAC meetings and focused Roundtables in local communities where problems have been identified		

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 5 Objective 1 S-O 3:</u></p> <p>APG 13: Maximize all aspects of PRP participation, including 70% of the work conducted at new construction starts at non-Federal facility sites on the NPL, and emphasize fairness in the settlement process. [Congressional/Key]</p>	<p>(268) Ensure fairness by making Orphan Share Offers at 100% of all eligible sites.</p>		
	<p>(269) Provide finality for small contributors by entering into De Minimis settlements</p>		
	<p>(270) PRPs conduct 70% of the work at new construction starts</p>		
<p><u>Goal 5 Objective 1 S-O 3:</u></p> <p>APG 14: Ensure Trust Fund stewardship by getting PRPs to initiate or fund the work and recover costs from PRPs when EPA expends trust fund monies. Address cost recovery at all NPL and non-NPL sites with a statute of limitations on total past costs equal to or greater than \$200,000. [Congressional/Key]</p>	<p>(267) Addressed 100% of SOLs at Cost Recovery cases at all NPL and non-NPL sites with total past costs equal to or greater than \$200,000 and report cost recovery</p>		

*Outcome measure

Performance Plan Goals	Annual Performance Measures	NPMS	Core Measures
<p><u>Goal 5 Objective 1 S-O 3:</u></p> <p>APG 15: Continue to make formerly contaminated parcels of land available for residential, commercial, and industrial reuse by addressing liability concerns through the issuance of comfort letters and Prospective Purchaser Agreements. [Not Congressional]</p>	<p>(280) Evaluate liability concerns- 100% of Prospective Purchaser Agreement requests addressed.</p>		
<p><u>Goal 5 Objective 1 S-O 4:</u></p> <p>APG 16: Ensure compliance with Federal facility statutes and CERCLA Agreements and ensure negotiation of Interagency Agreements (IAGs) for Federal facility NPL sites. [Not Congressional]</p>	<p>(271) Federal facility NPL IAGs- 80% of Federal facility sites will have IAGs in place within 18 months of NPL listing</p>		
<p><u>Goal 5 Objective 2 S-O 3:</u></p> <p>APG 17: Facilities will be managed so as to prevent releases into the environment. [Not Congressional]</p>	<p>(272) Produce a report on the number of civil and criminal enforcement actions initiated and concluded.</p>	<p>Enforcing the Law Set 9 - No. of notices issued, civil and criminal actions initiated and concluded, and self-policing settlements concluded</p>	<p>(6) Enforcement actions (e.g., cases, referrals, orders, notices) taken, by media</p>

Attachment E

NPMS Set 1, Statistically Valid Compliance Rates for Selected Regulated Populations

OECA will develop 5 statistically valid non-compliance rates in FY 2000. The five populations will be chosen from the following priority candidates:

1. Organic Chemical Sector SIC 2869 (Small sources which are LQG's)
2. Organic Chemical Sector SIC 2869 (HON for large sources)
3. Coal Fired Power Plants (NSR/NSPS compliance)
4. Integrated Iron and Steel (NPDES and Pre-Treatment)
5. Metal Services (CWA (NPDES majors)
6. NPDES Self Reporting for Municipal and Non-municipal for various permit limits

The original list of 16 candidate populations was the result of OECA and regional managers consultation on which populations were most important for OECA. That list was further narrowed down to the 6 candidates above based on the feasibility of calculating rates based on available data. Populations 1 - 5 above are MOA or sector priorities.

The noncompliance rates will be calculated using either a combination of targeted and/or random inspections. In general, if all or mostly all inspections are targeted the total number required is much higher than if most of the inspections are random. Additionally, using mostly targeted inspections will require information on the number and location of all planned FY 2000 inspections for each region (including states). Regional Measures Leads may be asked to coordinate the collection of regional inspection commitments for the sectors selected.

Decisions on the balance of random to targeted inspections will be made in consultation with Regions during January 2000. The methodology is complex and there are important trade-offs to consider. A detailed briefing on the methodology and inspection scenarios will be discussed at the January Senior Managers Meeting.

Attachment F

Implementation of NPMS Measures Sets 3 and 10

SET THREE: COMPLIANCE ASSISTANCE OUTCOMES

Purpose and Use of the Measure: This measure provides an indication of the scope and types of performance improvements (compliance and environmental) resulting from compliance assistance tools and the delivery of compliance assistance through targeted initiatives. During FY'99 the NPMS Set 3 Task Group developed a Guide for Measuring Compliance Assistance Outcomes and has distributed over 800 copies of the Guide to regional and state personnel. In addition the Task Group offered training courses, based on the Guide to 5 EPA Regions and their states, with 4 more training courses planned for FY 2000. Also, during FY'99 on May 17th, Assistant Administrator Steve Herman issued a request to Regions that they conduct one outcome measurement project for a Regional compliance assistance activity and to report the results of that exercise to OECA by 3Q FY'00. A list of these regional projects is attached.

In FY 2000, the following additional Set 3 activities will occur: 1) RCATS, the Lotus-Notes compliance assistance tracking system, will be modified to enable national tracking of outcome measures. 2) the series of compliance assistance surveys that have been developed by the regions to track the impact of their compliance assistance activities will be analyzed along with non-survey-based outcome data collection methods to determine a recommended method of conducting outcome measurement. 3) additional outcome measurement training for Regions 1, 2, 3 and 9. 4) The development of an additional generic ICR for Hqs and National Compliance Assistance Projects.

Definitions: The outcomes of compliance assistance activities have been defined to fit into three broad categories which are: a) Changes in awareness and understanding of regulations; b) Physical and behavioral changes; and c) Environmental and human health improvements. Specific measures have been developed for each of these categories. (Below.)

Reporting: In FY 2000, each Region will be implementing a compliance assistance outcome measurement project as pursuant to the May 17th Steve Herman memo (Regions that are completing their NPMS pilots will fulfill this requirement). By the end of 3Q FY 2000, the Regions should report 1) a brief description of the compliance assistance activity; 2) the goal of the activity; 3) the measures selected to evaluate the goal; 4) the type of follow-up method undertaken (e.g. survey, focus group, on-site revisit, database check); 5) the survey response rate and 6) the actual results data. Regions should use measures from the categories of measures developed by the NPMS Set 3 Task Group, below.

**NPMS SET 3 TASK GROUP
CATEGORIES OF COMPLIANCE ASSISTANCE OUTCOME MEASURES**

I.) Awareness/Understanding of Compliance Assistance Opportunities and Regulatory Requirements:

- a) % of facilities who improve their understanding of regulatory requirements

II) Behavioral Change Indicator Categories:

Regulatory:

- a) % of facilities that adopt regulatory requirements (e.g. notifications, permits, labelling, manifesting, reporting, recordkeeping etc...)
- b) Change in level of compliance (multi-media, subset, compliance indicators)

Non-Regulatory:

- a) % of facilities that adopt:
 - a) industrial process changes
 - b) environmental management systems or reviews
 - c) best management practices
- b) % of facilities that undertake self-audits
- c) % of facilities that adopt on-site visit recommendations and % of recommendations adopted
- d) % of facilities that change regulatory status (e.g. reduce waste to go from LQG to SQG)

III) Environmental and Human Health Improvements:

- a) % of facilities that reduce emissions or other pollutants
- b) % of facilities that show human health/worker protection improvements
- c) amount of emissions reduced, pollutants reduced and/or risk reduced

SET 10: COMPLIANCE ASSISTANCE OUTPUTS

Purpose and Use of the Measure: This measure provides an indication of the amount of compliance assistance activity occurring at Headquarters and in the Regions and of the number and types of regulated entities potentially affected by compliance assistance efforts. In FY '99 four Regions piloted the use of an electronic database to track compliance assistance output activities called RCATS (the Regional Compliance Assistance Tracking System). The pilot Regions were Regions Two, Three, Five and Nine. In addition to the pilot Regions, Regions One and Six used the system for end-of-year reporting purposes.

Results: At this time there are over 200 individual users of the RCATs system. As of September 30th, 1999, the Regions have reported through RCATS that they have conducted over 1100 compliance assistance activities and distributed over 120,000 tools that reached almost 400,000 potentially regulated entities. In a related but separate effort, OECA is funding a state version of RCATS through New Hampshire to convert the system into a platform, such as Microsoft Access, that is more commonly used among states. OECA will be working to develop outcome measure fields in RCATS so that outcome data can be consistently captured across Regions to produce national statistics. In addition, we will be examining the expansion of RCATS to capture other currently manually reporting measures under Sets 8, 9 and 11 of NPMS.

Reporting: In FY2000, RCATS will replace all manual reporting of regional and headquarters compliance assistance reporting. A region-specific FY 2000 version of RCATS will be made available to the regions by early January. RCATS has been modified for FY2000 to enable tracking of the FY2000/2001 MOA priorities and the compliance assistance activities that OECA will undertake under the September, 1999 OECA Action Plan. (Copies of the new RCATS screens are available from Lynn Vendinello, (202) 564-7066. RCRA program personnel who prefer to report their on-site compliance assistance visits in RCRIS rather than RCATS can continue to do so; however, we ask that the regional enforcement coordinator when submitting FY 2000 EOY numbers inform EPTDD of their plans.

Attachment F, Page 4

Regional Compliance Assistance Outcome Measurement Projects as Pursuant to Steve Herman Memo of 5/17/99 and NPMS Set 3 Pilot Projects

Region	Project Summary	Measurement Methodology	Timeline/Results
I	Evaluation of NEEAT Auto Service Compliance Assistance Program, which consists of written assistance material, workshops and on-site assistance. Contact: Peggy Bagnoli, 617-918-1828	Mailed Survey to 14,000 recipients of auto service compliance assistance.	Survey to be sent out 1 st Quarter FY2000
II	Evaluation of the effectiveness of the Dry Cleaning Compliance Assistance Program Contact: Kathleen Malone 212-637-4083	1. Develop a baseline of the compliance rate and perc alternative use among dry cleaners in NYC using data from inspections and compliance assistance visits that were conducted in to date (5/99). By 1Q '00 2. Revisits via c.a. and inspections; surveys to those not revisited. 3Q '00.	1. Baseline by 1Q '00. 2. Follow-up by 3Q '00.
III	Evaluation of Clean Air Act Risk Management Plan Compliance Assistance Workshops. Contact: Janet Viniski, 215-814-2999	Phone Survey to 100 attendees of the workshop.	1. 40% response rate. 2. 68% of facilities made changes as a result of the workshop
IV (NPMS Pilot)	NPMS Pilot Project: Charleston CBEP Project: Developing workshops/seminars/training and compliance guides and on -site visits. Bulk of assistance conducted by SC DHEC. Primary form of assistance is on sight. Assistance is provided to primarily Auto Repair and Paint Body Shop businesses Contact: David Abbott 404-562-9631	A. Compliance Baseline for 10 facilities (out of 150 total) B. Follow-Up to Baseline through on-site inspections after assistance provided C. Interim Report on Results	A. Done B. Done C. 1Q'00

Attachment F, Page 5

Region	Project Summary	Measurement Methodology	Timeline/Results
V	SDWA Project with the Department of Interior: Source Water Assessments for groundwater sources on National Park Service Lands. Assist States of Minnesota, Indiana, and Wisconsin making susceptibility determinations for water supplies.	A. Letters sent to 3 National Parks to outline process for info gathering B. Follow-up site visits that included providing assistance C. Summary report on assessments that may be used to develop management education and outreach materials for other Federal Facility compliance assistance visits. D. Surveys to Park Service Lands visited	A. Done B. Done C. End of 2 nd Q D. Mid-3rd Q
VI (NPMS Pilot)	NPMS Pilot: Educate Maquiladora industries through outreach seminars on their hazardous waste environmental management obligations. Seminars were conducted in July and August of 1998. Contact: Bonnie Romo, 214-665-8323	A. Compliance Manifest Baseline using RCRIS and HAZTRAKS. B. Survey seminar participants in mid-May of 1999. C. Section 3007 Request to determine changes in manifest baseline. (on hold due to contract problems) D. Final Report on Results	Project completion delayed . Completed. 150 surveys mailed out, 26 response. 16% response rate. a. 96% felt more aware and 60% had a better understanding. b. 58% made changes in env. practices and 50% made a physical change. c. 42% reduced waste
VI (NPMS Pilot)	Offer compliance assistance to the Maritime industry at a conference in August 1998. Contact: Bonnie Romo, 214-665-8323	A. Compliance Baseline. Region has an existing baseline. B. Follow-up survey to industry that attended the conference C. Post-Compliance Assistance Baseline through follow-up inspections to an industry sample. (7 or 8 already underway, facilities that attended the workshop). D. Final Report on Results	B. Completed. 123 surveys mailed out; 33% response rate. a. 93% felt more aware and 85% had a better understanding. b. 63% made changes in env. practices, 29% installed pollution control equipment, and 71% made a physical change. c. 24% reduced waste. C. Based on followup inspections, noncompliance dropped from 33% to 12%.

Attachment F, Page 6

Region	Project Summary	Measurement Methodology	Timeline/Results
VI (NPMS Pilot)	The Galveston County Health Department will on-site assistance to small businesses. Assistance will be conducted during 3Q of FY'99. Contact: Barry Feldman, 214-665-7439	A. Follow-up site visits to determine baseline compliance. B. Project evaluation.	A. 4Q B. 2Q FY'00
VII	EPCRA/TRI Release Inventory Project . Conducted four workshops/seminars/training and provide compliance assistance materials. These one-day workshops were conducted in April, 1999 and were sponsored by EPA, Region 7 and cosponsored by Local Emergency Planning Committees. Primary assistance involves instruction on completing Form R as required under Section 313 of EPCRA. Assistance is provided to industries listed by certain Standard Industrial Code (SIC) code that meet reporting requirements of EPCRA, Section 313. Also includes seven new industry sectors. Contact: Steve Wurtz, 913-551-7315	A. Follow-up survey to industries that attended workshops. B. Follow-up survey to industries in specific SIC codes that did not attend workshops. C. Analysis of Post-Compliance Assistance Baseline through review of Form Rs filed. E. Final Report on Results	A. 50% and 22% response rate. B. 1Q '00 C. 3Q '00
VIII	The overall goal of this project is to identify, measure and compare the most effective and efficient approaches to motivating facilities to achieve or exceed compliance, and the result to the environment. This is to be accomplished by developing measures for the various activities of enforcement (pollution prevention, compliance assistance activities, and other "non-traditional" activities) and incorporating these measures into the regional inspection case conclusion data sheets (CCDS). Contact: Judy Heckman Prouty, 303-312-6358	The Region 8 project calls for taking Case Conclusion information and reporting it as environmental outputs and outcomes (in addition to the "traditional" enforcement activities). Region 8 is working with the State of Colorado to identify the specific media, measurements and reports that will most effectively present and reflect compliance assistance activities. The selected measures and facilities will need to take into consideration already scheduled inspections in Region 8 states.	1. Determination of media/sector/geographic area (2 nd quarter 2000). 2. Ensure consistency/tie-in to NPMS measures (2 nd quarter 2000) 3. Focus groups with inspectors to test ability to measure activities (2 nd quarter 2000) 4. Incorporation into CATS database

Attachment F, Page 7

Region	Project Summary	Measurement Methodology	Timeline/Results
IX	<p>Compliance Assistance Outreach Materials for MACT degreaser standard. Contact: Angela Baranco, 415-744-1196</p>	<p>A. Compliance assistance baseline from site visits by San Joaquin Valley Air District and compliance reports and permits submitted to SJV and EPA. B. Pre-workshop survey of sources C. Post-workshop survey of participants.</p>	<p>A. 1Q '00 B. 1Q '00 C. 3Q '00</p>
X	<p>1. Evaluation of EPA workshops 2. Compliance status of Idaho drycleaners based on 16 inspections, including drycleaners that attended last year's workshops and/or received on-site technical assistance by EPA and the state. Contact: Kathy Veit, 206-553-1983</p>	<p>1. Survey of workshop participants at completion of workshops 2. Inspections</p>	<p>1. Results in house 2. Results in house.</p>

Attachment G

NPMS Set 4 - Improvements Resulting From Integrated Initiatives:

Data being used for this measure was requested in the 6/1/99 Memorandum from Elaine Stanley and Eric Schaeffer to Regions entitled *Proposed Performance Measures for FY 2000/2001 OECA MOA Priorities and Sector Strategies*.

FY 2000/2001 MOA PRIORITY MEASURES by Sector or Priority

Wet Weather	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement for SSOs, CSOs, Stormwater, CAFOS	X		X	
Number and type of Compliance Actions from enforcement actions for CAFO concluded cases	X		X	
Compliance status of CSO systems with CSO Control Policy	X			X
Permits: Stormwater - Number /percent of facilities with individual or general permits; CAFOS: Number/percent with NPDES permits	X		X	
No. of inspections targeted to identify SSOs		X	X	X
No. of Inspections in Priority Watersheds: CSOs, SSOs, CAFOs, % targeted inspections for SSOs		X	X	X
% of Enforcement Actions in Priority Watersheds CSOs, SSOs, CAFOs, Stormwater		X		X
No. of State Compliance and Enforcement Strategies developed for CAFOs		X		X
Existing Measures (No new reporting or data modification): No. of Inspections Conducted: CSOs, Stormwater, CAFOs, SSOs; No. of facilities reached through compliance assistance; No. of enforcement actions: CSOs, SSOs, Stormwater, CAFO's (no. concluded actions.)				
Petroleum Refining	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of activities (such as enforcement) for RCRA Refinery: for Refinery Fuel Gas; LDAR; Benzene Waste; NSR/PSD	X		X	
# of Compliance Actions from Enforcement (CCDS): Permit applications received for NSR/PSD; Emissions reductions/controls installed for NSR/PSD, LDAR, Refinery Fuel Gas, Benzene Waste; EMS auditing; Number of facilities that modify their operations to comply with RCRA requirements .	X		X	
No. of Self Disclosures resulting in Pollutant Reductions and amounts of reduction (CCDS): Benzene waste-NESHAP & RCRA	X		X	
Investigations for suspected NSR/PSD violations; LDAR violations; Benzene Waste- NESHAPS; RCRA Refinery; Refinery Fuel Gas		X	X	

Attachment G, Page2

Existing Measures (No new reporting or data modification): SNC rate for the sector; SNC duration and SNC recidivism; # of inspections conducted; # of enforcement actions initiated and concluded				
Iron and Steel	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement actions at unregulated sources	X		X	
Environmental restoration SEPS; enforcement actions with environmental restoration for groundwater contamination from slag disposal and sediment characterization or remediation:.	X		X	
Number of Facilities Self-disclosing Violations	X		X	
Percentage of minimills brought into compliance with NSPS AA and AAa	X			X
Implementation steps under minimill initiative : # sent letter,# cases concluded)	X			X
Number of investigations conducted		X		X
No. of inspections conducted at facilities with unregulated sources		X		X
Existing Measures (No new reporting or data modification): Total # of inspections conducted at facilities; SNC rate for the sector; SNC duration and SNC recidivism; # of enforcement actions initiated and concluded; No. of facilities reached through compliance assistance				
Primary Non-Ferrous	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement actions at Primary Smelters	X		X	
Compliance Actions from CCDS: Emissions, monitoring/sampling and record keeping for cases citing imminent and substantial endangerment; No. of facilities implementing industrial process changes as the result of Bevill enforcement actions	X		X	
Number of facilities in compliance with additional regulatory requirements identified as a result of reclassification as primary smelters	X			X
Number/percent of facilities reclassified as primary smelters	X			
Number of Reviews for Adequacy of Permits: Number/percent reviewed; Number revised or identified for revision upon renewal		X		X
Number of Facilities Self-disclosing Violations	X		X	
Number of investigations conducted		X		X

Attachment G, Page3

Existing Measures (No new reporting or data modification): Total number of inspections; # of enforcement actions taken citing imminent and substantial endangerment; total # of enforcement actions; No. of facilities reached through compliance assistance; SNC rate for the sector; SNC duration and SNC recidivism				
Chemical Sector	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement for SIC codes 2869 and 2899 by CWA, CAA, and RCRA	X		X	
Number and Type of Compliance Actions from enforcement actions	X		X	
Number of facilities that comply with EPCRA 312	X		X	
Number of Facilities Self-disclosing Violations	X		X	
No. of inspections conducted at priority areas (as defined by sector strategy);		X		X
No. of facilities that adopt regulatory requirements as a result of compliance assistance.		X		X
Existing Measures (No new reporting or data modification): Total no. of inspections; No. of facilities/states reached through compliance assistance; # of enforcement actions initiated and concluded; SNC rate for the sector; SNC duration and SNC recidivism				
SDWA Microbial	Outcome	Output	Existing w/ Modification	NEW
For TCR and SWTR enforcement actions provide emissions/discharge changes, testing, monitoring/sampling, record keeping, and reporting	X		X	
Compliance status of systems required to filter under SWTR ; for SWTR for systems with groundwater under influence of surface water;	X			X
No. of systems receiving compliance assistance for interim enhanced SWTR		X	X	
Percent TCR and SWTR SNCs addressed (SDWA: Microbial rules)		X	X	
Number of investigations conducted		X		X
Existing Measures (No new reporting or data modification): # of inspections conducted; # of enforcement actions initiated and concluded; SNC rate for the sector; SNC duration and SNC recidivism; No. of systems reached through compliance assistance				
Metal Services	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement for facilities modifying operations to comply with RCRA	X		X	
No. of Industrial process changes and emission/discharge changes to comply with RCRA requirements.	X		X	

Attachment G, Page4

Number of facilities that modify or cease operations to comply with RCRA requirements as result of enforcement actions	X			X
Metal Services - Continued	Outcome	Output	Existing w/ Modification	NEW
Number of new or revised Section 3001 Notifications received	X			
Number of facilities identified through enforcement actions as having illegal or improper waste management operations		X		
Number of investigations conducted		X		X
Existing Measures (No new reporting or data modification): SNC rate for the sector; SNC duration and SNC recidivism; # of inspections conducted; # of enforcement actions initiated and concluded				
Permit Evaders	Outcome	Output	Existing w/ Modification	NEW
Pounds of pollutants reduced as a result of enforcement for facilities modifying operations to comply with RCRA	X		X	
Industrial process changes and emission/discharge changes to comply with RCRA requirements	X		X	
Number of facilities that modify or cease operations to legally avoid permit or RCRA requirements as a result of enforcement actions.	X			X
Number of new permit applications or permit modifications requests received.	X			
No. of facilities identified in enforcement actions as having misidentified wastes.		X		X
Number of investigations conducted		X		X
Existing Measures (No new reporting or data modification): Total no. of inspections; No. of facilities identified in enforcement actions as having misidentified wastes; Number of enforcement actions initiated and concluded Number of facilities reached through compliance assistance				
CAA - NSR/PSD	Outcome	Output	Existing w/ Modification	NEW
Total pounds of pollutants for Criteria Pollutants (NOx, SO2, and PM)	X		X	
Pounds of toxic pollutants reduced as a result of enforcement	X		X	
Permit applications and emission controls for coal-fired power plants	X		X	
# facilities installing controls as the result of enforcement actions	X			
Investigations conducted for suspected NSR/PSD violations		X		X
Investigations conducted for Coal-fired Power Plants		X		X
Existing Measures (No new reporting or data modification): Number of inspections; Number of enforcement actions initiated and concluded; SNC rate for the sector; SNC duration and SNC recidivism; Number of facilities reached through compliance assistance.				

Attachment H

NPMS Sets 9 and 5 -- Audit Policy Disclosure Settlements:

This language appeared in the September 15, 1999 End of Year Enforcement and Compliance Data Reporting Memorandum from Frederick F. Stiehl, OC to Regional Enforcement Division Directors Regions 1,2,4,6,8, Regional Enforcement Coordinators and Regional Counsels.

The Office of Regulatory Enforcement (ORE) has asked that records related to Agency responses to audit policy self-disclosures be created in the civil DOCKET so that a complete picture of these activities and the benefits resulting from them can be developed. As a step towards that goal, Eric Schaeffer, Director, ORE, issued a memo dated March 29, 1999 "Completion of Case Conclusion Data Sheets in Audit Policy Cases and Other Disclosures" explaining the need for and the plans for this reporting. The DOCKET database will accommodate the full range of audit policy case data for FY 2000 reporting, after the DOCKET database structure is revamped to include new fields particular to these cases. This DOCKET restructuring is scheduled for the second quarter FY 2000.

In the interim, some basic audit policy data will be collected through the DOCKET for FY 1999 end-of-year reporting. These data will include the number of audit policy cases resolved during FY 1999 and some of the benefits of those actions (as reported on the case conclusion data sheets for those cases). To accomplish this reporting, Regions need to enter their audit policy self disclosure case settlements into DOCKET as follows. The universe of FY 1999 audit policy settlements will be based on FY 1999 settlements which are audit policy cases. This universe will be the number of FY 1999 settlements which have the DOCKET flag for "Audit Policy Applied" coded Y (yes). To be credited as a audit policy case, this flag must be set as Y. This flag is located on the Case Information screen in DOCKET.

FY 1999 audit policy settlements must include the correct action type in DOCKET (located on the Enter Settlement Information screen) so that it can be properly credited in the correct settlement type category. There are three different possible administrative action types for these cases. The vast majority of these cases are resolved without the issuance of a formal enforcement action- a result generally known as a notice of determination (NOD). For these settlements, a new settlement action type has been added to DOCKET - action type G for Notices of Determination. Action type G should be entered for these cases on the Enter Settlement Information screen. Less frequently, the audit policy case can result in a penalty order (action type B should be entered) or a non-penalty compliance order (action type F should be entered). Settlements where no final penalty is to be assessed will not be credited as penalty orders and should not be entered as penalty orders (action type B). Only actions which assess a final penalty will be credited as penalty orders.

Audit policy disclosures that resulted in a civil judicial referral to DOJ and an eventual judicial settlement should be coded as action type A (judicial settlement) and will be credited as such. For end-of-year reporting, audit policy settlements which result in judicial settlements or final compliance orders (w/ or w/o penalty) will be credited within those enforcement activity counts in addition to being credited within the audit policy settlement universe.

Attachment I

Implementation of NPMS Sets 6 & 7 SNC Duration and Recidivism

Purpose and Use of Measure: The behavior of regulated facilities/entities in Significant Noncompliance is especially important to the national enforcement program. Because they have committed the most serious violations, we are interested in measuring how quickly the facilities return to compliance and whether they commit subsequent violations that constitute Significant Noncompliance. These measures will be used to track trends in SNC duration and recidivism by media program over time.

Background Information. These measures will be implemented for FY '99 end of year (EOY) reporting purposes for CAA, NPDES, and RCRA, according to each program's own SNC/SV policy and definitions, using data derived by IDEA from their respective data systems. In FY 2000 when IDEA is linked to SDWIS, we will also implement these measures for the Safe Drinking Water Act Program. The measures require SNC/SV status records retroactively for several years. IDEA has been capturing SNC/SV status data from AFS, PCS, and RCRIS for four years and is the sole source for long-term SNC/SV information. (AFS maintains only the most recently entered SNC/SV status record. PCS does not retain SNC/SV status beyond eight quarters. RCRIS alone maintains an indefinite record of SNC/SV status.) Implementation of these measures will **not** require new reporting. However, Regions need to ensure that current SNC/SV records are complete and accurate in AFS, PCS, RCRIS and SDWIS.

Definition. NPMS Set 6 measure reports the average duration (mean) length of time facilities remain in "Significant Noncompliance" (SNC) or as "Significant Violators" before resolution. Duration (continual SNC/SV status) is measured for facilities which have resolved SNC/SV status, calculating retroactively to the date at which SNC/SV status began. SNC/SV status is considered continual even if the reason for classification as SNC/SV is different from one reporting period to the next, as long as the SNC/SV status is not interrupted. For FY 2001 Annual Performance Measures Reporting purposes, we have committed to, "Increase by 2 percentage points the number of facilities that return to full physical compliance in less than two years for Clean Air Act, Clean Water Act, and Resource Conservation and Recovery Act programs from the FY 98 baseline."

NPMS Set 7 "Recidivism" Definition Change: After 3rd quarter testing of NPMS Set 7 measure reports on "recidivism", we have decided to revise the measure. Previously, the measure was to express the proportion of SNCs which are resolved and again become SNC within a two-year period, against all current SNCs. (Facilities are considered recidivist if the SNC/SV record shows that they are currently SNC/SV and within the prior two years were not SNC and prior to that were an SNC/SV.) While useful as a targeting measure, this portrayal of "recidivism" did not provide measurement data on the outcome of the enforcement program on preventing repeat violations. The NPMS Set 7 measure reports on "recidivism" now is defined for each program as the percentage of facilities in significant noncompliance that return to compliance and then revert to significant

noncompliance within 24 months. Moreover, the pool of potential recidivist facilities is restricted to those facilities for which we have the ability of knowing that they are recidivist. We have decided to make this restriction by limiting the pool to facilities that have been inspected at least once in the 24 month period or are otherwise know to be SNCs (e.g. through DMRs). For FY 2001 Annual Performance Measures Reporting purposes, we have committed to “Reduce by 2 percentage points the level of significant noncompliance recidivism in the Clean Air Act, Clean Water Act, and Resource Conservation and Recover act programs from FY 98 levels.”

Results: An analysis of 2nd quarter FY 99 data for duration showed the following:

2 Q FY '99 SNC Duration	< 6 month	6 months to one year	1-2 yrs	> 2 years
CAA	36%	19%	21%	24%
CWA	75%	14.5%	6.5%	4%
RCRA	53%	20%	14%	13%

For the recidivism measure we looked at SNC facilities that returned to compliance in FY '96. The results were as follows:

SNC Recidivism	
CAA	36%
CWA	56%
RCRA	8%

Reporting. Neither of these measures require new reporting. See March 3, 1999 memo for details. Please note that OC is still working on modifying AFS to add software which will create a data field associated with the determination of SNC/SV status for a facility.

Attachment J

Implementation of NPMS Set 8--Compliance Monitoring (Revised on May 13, 1999)

This guidance has been revised based on a review by a group of Regional and Headquarters personnel after a series of questions resulted from the March 3, 1999 memo and guidance.

Investigations

Purpose and Use of Measure: This measure is designed to count and recognize the number of investigations conducted by the national program and by Regional Offices. These investigations often detect serious patterns of noncompliance requiring correction through major enforcement action. This measure will be used in conjunction with number of inspections and other information to review national, regional, and media program outputs for compliance monitoring. OECA is considering collecting outcome information from investigations in FY 2000 through the Case Conclusion Data format.

Generic Definition of Investigation: An investigation is a more complex assessment of a facility's compliance status than a compliance inspection defined through specific media guidance (see some examples below). Inspections typically assess facility compliance *broadly*. Investigations, on the other hand, generally focus on *certain aspects* of a facility's operations or on a *predetermined* set of compliance concerns, and do so in substantially more depth than an inspection. Investigations involve considerably more time (more than 1 day) and resources to complete.

Typically, an investigation is **initiated** in one of two ways: 1) based on information discovered during an inspection, or 2) as the result of an overall industry sector or specific regulatory or statutory area (see investigation example below). An October 26, 1998 memo titled MOA Guidance (Air Program) Clarification and NPMS Pilot describes the CAA investigation in greater detail.

Note: Investigations are only required to be conducted in the CAA, as described in the FY 98/99 and FY00/01 MOA guidance. All other media investigations initiated and conducted are at the discretion of the Regions. Given the anticipated level of effort to initiate and complete investigations, the total number of all media investigations initiated in a given year should NOT exceed five (5)% of the total number of compliance inspections conducted in the Region in a given year. The 5% is not a minimum number of investigations per year.

Definiti

ons: Further Clarification by Statute

RCRA, CAA Stationary Source, and CWA NPDES additional definition:

Investigations in RCRA, CAA, and CWA-NPDES will generally be undertaken to address unpermitted activities or violations of permitted activities to a degree that they could result in possible significant human health or environmental impacts. Examples include operating a Treatment, Storage or Disposal facility without a RCRA permit; discharging waste water to a

navigable waterway without a an NPDES permit; OR expanding capacity which will increase air emissions without a PSD or NSR permit review.

FIFRA additional definition:

The 1991 Pesticides Inspection Manual describes *follow-up investigations*. These investigations are conducted in response to reported or suspected incidents to develop the necessary evidence to support any enforcement action that may be taken as a result of an apparent pesticide misuse. Follow-up FIFRA/TSCA investigations tend to be more complex than use inspections since they may involve visiting multiple sites, interviewing more persons, and/or collecting samples of various types.

Examples of Inspections that are NOT investigations:

Media Specific Compliance Inspections that are NOT investigations:

RCRA: The primary type of inspection is defined as a Compliance Evaluation Inspection (CEI). Other RCRA inspections include Case Development (CDI), Ground-Water Monitoring Evaluation (CME), Compliance Sampling (CSI), Operation & Maintenance (O&M), Laboratory Audit (LAI), and State Oversight (SOI).

CWA NPDES: The primary type of inspection is defined as a Compliance Evaluation Inspection (CEI). Other NPDES inspections include Compliance Sampling (CSI), Performance Audit (PAI), Compliance Biomonitoring (CBI), Toxics Sampling (XSI), Diagnostic (DI), Reconnaissance (RI), Pretreatment compliance (PCI), and Legal Support (LSI).

CAA Stationary Source: The primary type of inspection is defined as a Level 2 Inspection. Other CAA inspections include Level 0, Level 3, Level 4, and Level 5.

NOTE: If the Region conducted a combination of compliance inspections at a particular facility to determine its compliance status and/or to address a specific environmental problem, these inspections could form the basis of a single investigation. Routine multi-media inspections are NOT counted as investigations.

Example Investigations:

CAA Investigation Example:

EPA Region III formed a team to investigate compliance with Clean Air Act requirements at pulp mills. The group developed innovative targeting techniques to identify and address facilities that have escaped major permitting requirements. Research by the group indicated that overall production capacity had increased significantly, but no new permits had been obtained. The region then undertook investigations at specific facilities. The EPA-wide Refinery Compliance and Enforcement Workgroup identified investigative strategies for determining compliance with leak detection and repair requirements (i.e., comparative monitoring using the approved test

Attachment J, Page 3

method) and with the benzene water NESHAP (i.e., sampling of waste streams and/or detailed review/analysis of total annual benzene submissions and related company records).

The following Table provides two (2) examples of how investigations are initiated, what outcomes might result and some activities that could be conducted by the Regions.

Type	Initiation of investigation	Outcome of the investigation	Some activities to undertake
RCRA	Identified after an inspection or by a Regional effort to address specific environmental problem	Address ground water contamination from slag disposal at a iron and steel facility (ies)	Implement one or more problem statements in iron and steel sector strategy
CWA	Identified after an inspection or by a Regional effort to address specific environmental problem	Address degraded water quality in a geographic area or watershed	Investigate indirect discharges to a POTW to determine source problem

Reporting: The following information should be reported semiannually (examples in italics)

of Investigations (Initiated) 7

Media Program *Clean Air Act*

Investigation Type *New Source Review – two CAA inspections were conducted as part of two separate CAA investigations at pulp/paper mills*

Violation Type *Failure to apply for a New Source Review permit
Failure to monitor in accordance with Method 21*

Type of Response *New Source Review-- Region is preparing one administrative complaint and one judicial action for two separate facilities. The remaining three investigations are still underway.*

LDAR-- Region is preparing one judicial action. The remaining investigations is still underway.

The information for the categories above should be provided by media, and collected by the staff involved in the investigations. CAA investigations should have been reported in EOY FY 98 and mid-year FY99. For the 3rd & 4th Quarters FY99, investigation information should be reported manually, using the reporting form below. This data should be reported by November 1, 1999. Consideration is being given to establish electronic reporting beginning in FY 2000 when semiannual reporting will be required.

NPMS Set 8 Manual Reporting Form for Compliance Monitoring “Investigations”
of Investigations (Initiated)
Media Program
Investigation Type
Violation Type
Type of Response (NOV, Referral, etc.)

Completed forms should be received by OECA as per mid year and end of year reporting schedule. Please send completed forms to: **Lynn Vendinello, 2222A, US EPA, 401 M Street S.W., Washington, D.C., 20460.**

Questions and Answers Pertaining to the Investigation Definition

1. Is the generic definition of investigations confusing? *Yes, the language is confusing. If so, what specific language is confusing? The language on investigations has been clarified dealing with whether investigations are required, the total number of investigations expected in a given year, and what initiates an investigation.*
2. Are the additional definitions of RCRA, CAA-stationary source, and CWA-NPDES confusing? If so, how? *Yes, change the examples provided for RCRA, CAA, and CWA NPDES. Expand the example to include permitted facilities in a significant way that might impact human health and the environment.*
3. Do investigations apply to all media? *For now, the term should apply to all media. If not, which media should be excluded? RCRA? CWA? EPCRA? No media are excluded until information is gained on the concept of investigations.*
4. How do you count investigations under the CAA, namely, are Title V and PSD/NSR separate investigations? *Investigations only include the narrowly focused in-depth activities on a particular aspect of the CAA (e.g., Title V, PSD/NSR, and LDAR). The 3/3/99 guidance states “an investigation is a more complex assessment of a facility’s compliance than a compliance inspection defined through specific media guidance. Inspections typically assess facility compliance broadly. Investigations generally focus on certain aspects of a facility’s operations or on a predetermined set of compliance concerns, and do so in substantially more depth than an inspection”.*

If the Region is conducting in-depth, complex, intensive Title V activities at a facility, it would count as one (1) Title V investigation.. If they are also conducting in-depth, complex, intensive PSD/NSR activities at the same facility, it should be counted as a separate PSD/NSR investigation.
5. If an inspection is one of the activities done as part of a larger investigation can it be counted in as a compliance inspection? *The compliance inspection will be counted in the full count shell reporting number. However, routine compliance inspections **cannot** be counted as an investigation. Routine compliance inspections includes pre-planning, field work, and post-inspection follow-up. Case development, following a routine compliance inspection to address violations or significant non-compliance, is **NOT** an investigation.*
6. FIFRA/TSCA inspections are really investigations. How do we count them? *Region IV polled the program media staff. The staff said they only conduct inspections under FIFRA/TSCA, not investigations. This needs to be confirmed in other Regions.*

7. Do we need program-by-program investigation definitions? *Too early to say one way or another. As the Regions gain more experience with investigations, program specific definitions may evolve. In the meantime the Regions should use the generic definition as guidance on determining an investigation. Are some program specific inspections equal to or similar to an investigation? No. A routine compliance inspection conducted following the applicable media specific inspection guidance is NOT an investigation. If so, identify them? None.*
8. Does the term “investigation” only apply to the CAA activities being conducted under PSD/NSR, Title V, etc. and no other programs? *No. As the Regions gain more experience with investigations it may be that the term may not apply to some regulatory programs. In the meantime the Regions should define and undertake investigations according to the generic definition of investigations in all media.*
9. Are investigations required by the MOA guidance? **ONLY** in the Clean Air Act program. The FY 98/99 and FY 00/01 MOA guidance describes investigations to be conducted in the Clean Air Act program. However, investigations initiated in other media programs will be at the discretion of the Region.
10. How do we count pretreatment investigations in which we search for illicit/unpermitted connections? Is it a single investigation, or is each facility that is investigated an investigation, or do we count only those facilities that we actually take enforcement actions against? *It depends. If the activity is ROUTINE (follow the published pretreatment inspection guidance to check illicit or unpermitted connections), it would **not** constitute an investigation.*

*However, if the Region undertook a detailed focused review of each illicit/unpermitted connection to a POTW beyond the available inspection guidance, the entire effort would probably be categorized as one (1) investigation. The entire effort to locate, define, and categorize unpermitted pretreatment connections associated with a single POTW would count as one investigation. **Example:** The Regions, with or without State assistance, conducts ten (10) on-site detailed (e.g., sampling, records, process, permit check, etc.) reviews of indirect discharges to a POTW. These ten detailed reviews, in combination with any other activities to determine compliance, would constitute one (1) CWA Section 404 investigation.*
11. A more generic question based upon the above, is how do we count multi-media and/or multi-facility investigations? *Routine multi-media inspections are NOT investigations. However, if the multi-media inspection at a facility is designed to focus on a specific environmental problem associated with a national sector strategy (e.g., groundwater contamination from slag disposal in the iron and steel sector), it could qualify as a facility investigation. Investigations are focused and narrow activities to address a specific environmental problems. Multi-media inspections, by their very nature, are designed to be **broad** in scope.*
12. The guidance emphasizes investigations of unpermitted facilities. Some programs requires reporting without being formally permitted (e.g., TRI, or categorical pretreatment facilities located discharging to POTWs that do not have pretreatment programs). Do investigations of these

Attachment J, Page 6

non-reporters count? *No. The guidance does not emphasize investigations of unpermitted facilities. It uses unpermitted facilities as an example of what might constitute an investigation. Generally the routine activities a Region conducts to determine non-compliance would NOT constitute an investigation. Activities associated with investigations are time intensive, involved, and outside the routine activities regions conduct. The example provide in the question does not appear particularly special or unique. Are there other broad categories or "investigation types" that are included (any that are specifically excluded)? There are no other broad categories of potential investigations.*

13. We sometimes do geographic based reconnnaisance investigations, that are multi-media and multi-program in nature. After the initial reconnaissane, we focus in on a subset of facilities for more intense scrutiny. Is the initial reconnaissane an investigation? *No, the reconnaissane alone **cannot** be counted as an investigation. We assume the more specific follow-up activities are investigations? It depends upon the specific activities and the depth of the activities undertaken by the Region.*

14. Are we correct to assume that the reporting form in Attachment 3, Page 4 is a summary or aggregation of all the investigations (i.e., OECA will receive a single piece of paper and not a form for every investigation)? *Correct. However, if the Region conducts a significant number of investigations (~25-30/year), the information on the reporting form could be more than a single piece of paper.*

This is an **example only** of a completed manual reporting form which has been done correctly.

NPMS Set 8 Manual Reporting Form for FY 2000	
<i>EPA Region _____</i>	
# of Investigations (Initiated)	62
Media Program: Clean Air Act	
Investigation Type:	<i>PSD/NSR</i> 37 <i>Synthetic Minor</i> 18 <i>MACT</i> 5 <i>NSPS</i> 2
Violation Type	PSD/NSR Failure to obtain PSD permit Failure to obtain PSD permit (state lead) Synthetic Minor MACT rule violation Fail to install controls; opacity(state lead) MACT Chrome, record keeping Chrome, record keeping, no O & M Plan Aerospace, using non-compliant material Chrome, fail to install controls Chrome, record keeping NSPS Fail to operate controls
Type of Response (NOV, Referral, etc.)	
	PSD 3 - referral to DOJ 3 - state adm. penalty order 12 - referrals in preparation 19 - still analyzing investigation information Synthetic minor 1 - adm. compliance order 1 - state adm. penalty order 7 - referrals in preparation 9 - still analyzing investigation information MACT 3 - adm. compliance orders 2 - outstanding waiver requests NSPS 1 - adm. compliance order 1 - still analyzing investigation information

NPMS Set 8 Manual Reporting Form for FY 2000
EPA Region _____

of Investigations (Initiated) - 8

Media Program: RCRA

Investigation Type:

- A. Unpermitted TSDF/Storage
- B. Unpermitted TSDF/Disposal
- C. Failure to Determine
- D. Unpermitted TSDF/Disposal
- E. Organic Chemical - Recycling
- F. Unpermitted TSDF/Storage
- G. Subpart CC
- H. Organic Chemical Initiative

Violation Type:

- A. Unpermitted TSDF/Storage
- B. Unpermitted TSDF/Disposal
- C. Failure to Determine/Part 262
- D. Unpermitted TSDF/Disposal/Removal Action
- E. TSDF Storage/Speculative Accumulation
- F. TSDF/Storage
- G. Failure to determine applicability and comply with CC
- H. Waste Determination/Illegal Disposal of Catalyst

Type of Response (NOV, Referral, etc.)

- A. Administrative Order with follow up - ability to pay issues
- B. Administrative Penalty Order to be issued
- C. Administrative Penalty Order to be issued for no program
- D. Administrative Penalty Order to be issued
- E. Concluded due to off-specification product determination
- F. Corrective Action Order to be issued with closure plan requirement
- G. Case still under investigation
- H. Case still under investigation

NPMS Set 8 Manual Reporting Form for FY 2000

EPA Region ____

of Investigations Initiated --- 29

Media Program: WATER

Investigation Type :

Storm water (14)

SPCC (13)

NPDES discharge without permit (2)

Violation Type:

Failure to have storm water permit

Failure to prepare and implement storm water pollution prevention plan

Failure to have an SPCC plan

Discharge of oil in harmful quantities

Discharge without an NPDES permit

Type of Response (NOV, Referral, etc.):

11 Referrals to DOJ

1 APO

Up to 16 Referrals in preparation

1 APO in preparation

example

Attachment K

Compliance Inspection Outcomes

This measure is being implemented in Region II on a pilot basis. Data is not being reported for GPRA purposes.

Purpose and Use of Measure . This is designed to measure the environmental effectiveness and deterrent effect of performing environmental compliance inspections. Compliance inspections produce significant environmental results that are not currently collected and reported to the national compliance and enforcement databases. Examples of Compliance Inspection Outcomes include changes in materials handling, instituting best management practices, establishment of waste minimization practices, and early correction of potential violations.

Generic Definition. Compliance Inspection Outcomes are defined as either physical or behavioral changes that occur during or as a result of an inspection. These changes can either be an actual observed physical change (e.g., closing off an illegal water discharge, labeling a hazardous waste drum, cleaning up oil stained soil) or a perceived behavioral change (e.g., facility representative states they will institute an improved environmental practice).

Reporting. Four basic questions need to be answered at the conclusion of each compliance inspection.

1. Was compliance assistance provided? Type of compliance assistance?
2. Number of inspections where NO deficiencies were identified?
3. Did the facility take or promise to take corrective action with respect to identified deficiencies?
4. Were other environmentally beneficial actions taken in response to the inspection?

Attachment L

Reporting Compliance Assistance Tracking System (RCATS) will be available in each region by January 10, 1999. If You Need Help . . .

If you experience start-up problems, please contact your Regional Lotus Notes Administrator. For additional help, you may also contact your regional RCATS pilot coordinator/contact. Headquarter contacts for RCATS are Donna Inman, (202) 564-2511, e-mail: inman.donna@epa.gov; Tracie Bynum at 202-564-7086, e-mail bynum.tracie@epa.gov and Lynn Vendinello, (202) 564-7066, e-mail: vendinello.lynn@epa.gov.

Regional Contact Information

	Compliance Assistance Contacts	Lotus Notes Administrator
Region 1	Ronnie Levin, (617) 918-1716	Warren Lee (617) 918-1946
Region 2	Kathleen Malone, (212) 637-4083	Susan Lin (212) 637-3331

Region 3	Janet Viniski, (215) 814-2999 Garth Connor, (215) 814-3209	Andrea Parker (215) 814-5357
Region 4	Patty Jackson, (404) 562-9682	Bill Peltier (404) 562-9982
Region 5	Linda Mangrum, (312) 353-2071	Mario Fonseca (312)886-6703
Region 6	Connie Overbay (214) 665-7274/6756	Justin Hathaway (214) 665-7334
Region 7	Linda McKenzie (913) 551-7447	Mary Gerken (913) 551-7541
Region 8	Liz Rogers, (303) 312-6974	Andy Onushco (303) 312-6531
Region 9	Jim Grove (415) 744-2218	Anne Murphy (415) 744-1809
Region 10	Clark Gaulding (206) 553-1849	Ken Kerner (206) 553-4017