

## State Review Framework – A review of the Compliance and Enforcement Program

Every three years, the Environmental Protection Agency (EPA) conducts a State Review Framework (SRF), which is a review of a state's performance implementing compliance elements of federal programs under the Clean Water Act, the Clean Air Act, and the Resource Conservation and Recovery Act. EPA recently completed a review of the Division of Water's Alaska Pollutant Discharge Elimination System (APDES) Compliance and Enforcement program under the Clean Water Act. The SRF Report (covering October 2011 – September 2012 timeframe), released on December 29, revealed some areas where improvement is needed.

Although DEC only recently received authority to administer the APDES permitting and compliance programs in Alaska, the success of the APDES permitting program demonstrates DEC's commitment to build and implement robust programs under the Clean Water Act. Through ongoing program development, DEC expects the same level of success in the Division of Water's compliance program as has been achieved in the more mature program in the Division of Air Quality.

DEC has already made significant improvements to the program since the SRF review period, including:

- Hired a new program manager and filled several staff vacancies
- Provided training for new staff including Basic Inspector Training
- Developed written procedures to streamline processes and promote consistency including guidance and templates to write inspection reports, determine a permittee's compliance, and take enforcement actions
- Inspected 98 facilities during 2013
- Inspected 100 facilities during 2014

To address the remaining recommended improvements in the SRF Report, DEC has developed a Two-Year Program Improvement Plan:

### **Year One: July 1, 2014 – June 30, 2015**

- Provide training for new staff including sampling, and penalty calculation
- Develop written procedures to streamline processes and promote consistency including
  - guidance for data and records management, database system usage, penalty calculation, and communications processes
- Inspect 100 facilities in 2015
- Complete pending enforcement actions by March 1, 2015
- Conduct an industrial pretreatment survey of large communities in Alaska
- Conduct quarterly reviews of procedures and guidance to gauge efficacy and revise as needed

### **Year Two: July 1, 2015 – June 30, 2016**

- Meet Pretreatment Program inspection
- Provide training to staff to review quality assurance project plans
- Conduct quarterly reviews of procedures and guidance to gauge efficacy and revise as needed