

ENVIRONMENTAL PROTECTION DIVISION

AAPCA Best Practice 2019: Quarterly Data Verification

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Air Protection Branch

AAPCA Fall Meeting August 27, 2019



EPA State Review Framework

- 25 Clean Air Act data metrics verified annually for each Federal Fiscal Year, including basic facility information, compliance activities, stack tests, and enforcement
- Additional file metrics reviewed on-site every 3-4 years

Multi-Media Aspect

- Areas for improvement identified in several data areas across all media led to participation from all three branches and District Offices
- Georgia EPD's Director's Office developed criteria and kicked off project in September 2015 to verify data on a quarterly basis









VERIFICATION PROCESS

Reporting Forms

- Identification and description of data, including responsible parties
- Status of data entry
- Accuracy of data entry
- Corrective Action Plan

Availability of Data

- Integrated Air Information Platform (IAIP, or Platform)
- Enforcement Log
- Integrated Compliance Information System (ICIS-Air)
- Enforcement and Compliance History Online (ECHO)



REPORTING FORM

- Identification and description of data
 - Permitting, Compliance, Monitoring, District Offices
- Status of data entry
 - Has all required data been received and entered by EPD staff?
 - If not, Corrective Action Plan (CAP) may be required
- Accuracy of data entry
 - Do numbers match from the Platform to ICIS-Air or ECHO?
 - Is specific information from random selection of reported actions accurate?
 - If numbers are off by more than 10% or specific information is incorrect, CAP is required
- Corrective Action Plan



REPORTING FORM



Richard E. Dunn, Director

Air Protection Branch 4244 International Parkway Suite 120 Atlanta, Georgia 30354 404-363-7000

August 2, 2019

TO: Donald Kirkland, Policy and Planning Coordinator

CC: Karen Hays; District Managers; Eric Cornwell, Daniel McCain, Tammy Martiny, Steve Allison, Stephen Damaske, Michael Odom, Farhana Yasmin, DeAnna Oser

FROM: Sean Taylor, Stationary Source Compliance Program Manager

RE: Air Data Quality Assessment for Quarter ending 6/30/2019

- Identification Data Sets, applicable federal fund source/grant no., and name(s) of individual and/or contractor responsible for data set
 - Stationary Source Permitting (SSPP) Information submitted to ICIS Air (Title V Funded)
 Stationary Source Permitting Units (Eric Cornwell)
 - Stationary Source Compliance (SSCP) Information submitted to ICIS Air (Title V Funded)
 Stationary Source Compliance Units (Sean Taylor)
 - Industrial Source Testing (ISMU) Information submitted to ICIS Air (Title V Funded) Industrial Source Monitoring Unit (Daniel McCain)
 - d) District Offices stationary source compliance inspection information submitted to ICIS-Air (Title V Funded), District Offices (Applicable District Manager)
- 2. Description of Data Sets
 - a) SSPP Information: See Table 1 Attached. Entered into Integrated Air Information Platform by SSPP staff, flows to ICIS-Air.
 - SSCP Information: See Table 1 Attached. <u>Entered into</u> Integrated Air Information Platform by SSCP staff, flows to ICIS-Air.
 - c) ISMU Information: See Table 1 Attached. Entered into Integrated Air Information Platform by ISMP staff, flows to ICIS-Air.
 - d) District Information: See Table 1 Attached. Entered into Integrated Air Information Platform by District staff, flows to ICIS-Air.

- 3. Status of Data Entry (is entry current; if not, CAP required)
 - a) SSPP Information:
 - i. Active Majors: Data identified in Table 1 have been assessed and are current.
 - ii. Active SM: Data identified in Table 1 have been assessed and are current.
 - iii. Active NESHAP 61 minors: Data identified in Table 1 have been assessed and are current
 - iv. Active TV: Data identified in Table 1 have been assessed and are current.
 - b) SSCP Information: [Status of each SSCP item in Table 1].
 - Notices of Violation issued: Two (2) NOVs issued during the quarter were not submitted to EPA.
 They were submitted upon discovery on August 2, 2019.
 - ii. Consent Orders executed: Data identified in Table 1 have been assessed and are current.
 - iii. Inspections conducted: One (1) inspection completed during the quarter has not been entered.
 - Full Compliance Evaluations completed: Four (4) FCEs for inspections conducted during the quarter have not been entered.
 - v. Periodic Reports Reviewed: Four (4) reports received during the quarter have not been entered.
 - vi. Annual Compliance Certifications Reviewed: Not applicable during the quarter.
 - c) ISMU Information: [Status of each ISMP item in Table 1].
 - Since ICIS-Air is only able to search by the date that stack tests are conducted and EPD is permitted up to 120 days to receive and review the report, the data assessed for this report are tests conducted from January 1 March 31, 2019, that have been reviewed up through July 25, 2019 (the date of the last data unload prior to this report).
 - Passing stack tests: One (1) test conducted during the quarter has not been entered (it was not received until July 15).
 - ii. Failed stack tests: Data identified in Table 1 have been assessed and are current.
 - iii. Stack tests observed and reviewed: Data identified in Table 1 have been assessed and are current.
 - iv. Stack tests reviewed only: Data identified in Table 1 have been assessed and are current.
 - d) District Information: [Status of each District item in Table 1].
 - i. Notices of Violation issued: Data identified in Table 1 have been assessed and are current.
 - ii. Consent Orders executed: Data identified in Table 1 have been assessed and are current.
 - iii. Inspections conducted: Data identified in Table 1 have been assessed and are current.
 - iv. Full Compliance Evaluations completed: Data identified in Table 1 have been assessed and are current.
 - v. Periodic Reports Reviewed: Data identified in Table 1 have been assessed and are current.
 - vi. Annual Compliance Certifications Reviewed: Not applicable during the quarter.

For each data set, any information that is not current shall be identified in this section.

If data reviewed per Table 1 are accurate, status shall indicate such with the following statement: "Data identified in Table 1 have been assessed and are current."

- Accuracy of Data Entry (define specific process to verify accuracy (this does not change); define threshold to trigger CAP(does not change); report results; provide CAP)
 - a) SSPP data: Data identified in Table 1, column 2 for stationary source permitting will be queried from the Integrated Air Information Platform (IAIP). Information from the IAIP is uploaded through the node provided by the virtual exchange service. Number of facilities with permitting action for preceding quarter is taken from monthly reports from staff through management.



REPORTING FORM

TABLE 1 Data Sets to be Assessed

Responsible Program	Total Entries to be Verified	Records to be assessed for accuracy	
Stationary Source	Number of Active Major Facilities (non-SD, A) i. IAIP: 352 ii. ICIS-Air: 355	Records for 10 facilities permitted during the quarter Checked in IAIP:	
Permitting Program (SSPP)	Number Active SM Facilities (non-SD, SM&mbr) i. IAIP: 1336 ii. ICIS-Air: 1341 Number Active NESHAP 61 Minor Facilities i. IAIP: 23 ii. ICIS-Air: 22 Number Active TV Facilities (non-SD, TV) i. IAIP: 363 ii. ICIS-Air: 364		
		GRP Madison	
		McIntyre 31900027	
		Union Agener, 24500155	
		Hunter Army Airfield 05100149	
Stationary Source Compliance Program (SSCP)	Number of inspections i. IAIP: 120 (81 APB + 39 District) ii. ICIS-Air: 120 Number of Full Compliance Evaluations (FCE) i. IAIP: 117 (81 APB + 36 District) ii. ICIS-Air: 117 Number of Periodic Reports i. IAIP: 155 (129 APB + 26 District) ii. ICIS-Air: 155 Number of Annual Compliance Certifications i. IAIP: 3 (2 APB + 1 District) ii. ICIS-Air: 3 Number of NOVs issued i. IAIP: 42 (32 APB + 10 District) ii. ICIS-Air: 40 Number of Consent Orders i. IAIP: 10 (7 APB + 3 District) ii. ICIS-Air: 10 Number Stack test passing results	Records for 5 inspections completed - the data verified was accurate Records of 5 FCEs completed in the quarter - the data verified was accurate Records for 5 periodic reports - the data verified was accurate Records for 20 ACCs in the 2 rd quarter - not applicable Records of 5 enforcement actions issued during the quarter - the data verified was accurate	
Industrial Source Monitoring Unit (ISMU)	Number Stack test passing results i. IAIP: 280 ii. ICIS-Air: 280 Number Stack test failing results i. IAIP: 4 ii. ICIS-Air: 4	Records of 10 stack tests completed during the quarter – the data verified was accurate	

	Number Stack Tests observed and reviewed	
	i. IAIP: 55 ii. ICIS-Air: 55	
	Number Stack tests only reviewed i. IAIP: 230 ii. ICIS-Air: 230	
Coastal District (Brunswick)	Number of Periodic Reports i. IAIP: 9 ii. ICIS-Air: (reported in SSCP report)	Periodic Reports: 1 – the data verified was accurate
	Number of Inspections i. IAIP: 3 ii. ICIS-Air: (reported in SSCP report)	Inspections: 1- the data verified was accurate
	Number of FCEs i IAIP: 3 ii. ICIS-Air: (reported in SSCP report)	FCEs: 1 - the data verified was accurate
	Number of NOVs issued i. IAIP: 3 ii. ICIS-Air: (reported in SSCP report)	
East Central District	Number of Periodic Reports i. IAIP: 2 ii. ICIS-Air: (reported in SSCP report)	Periodic Reports: 1 – the data verified was accurate
(Augusta)	Number of Inspections i. IAIP: 0 ii. ICIS-Air: (reported in SSCP report)	Inspections: 0
	Number of FCEs i. IAIP: 0 ii. ICIS-Air: (reported in SSCP report)	FCEs: 0
Mountain District (Atlanta and Cartersville)	Number of Periodic Reports i. IAIP: 0+9=9 ii. ICIS-Air: (reported in SSCP report)	Periodic Reports: 0 + 3 = 3: the data verified was accurate
	Number of ACCs i. IAIP: 1 ii. ICIS-Air: (reported in SSCP report)	ACCs: 1
	Number of Inspections i IAIP: 1 + 29 = 30 ii. ICIS-Air: (reported in SSCP report)	Inspections: 1 + 4 = 5: the data verified was accurate
	Number of FCEs i IAIP: 0 + 27 = 27 ii. ICIS-Air: (reported in SSCP report)	FCEs: 0 + 4 = 4: the data verified was accurate
	Number of NOVs issued i IAIP: 2 ii. ICIS-Air: (reported in SSCP report)	
	Number of Consent Orders i. IAIP: 2 ii. ICIS-Air: (reported in SSCP report)	
Northeast District (Athens)	Number of Inspections i IAIP: 2 ii. ICIS-Air: (reported in SSCP report)	Records for 2 inspections completed – the data verified was accurate
	Number of FCEs i. IAIP: 2 ii. ICIS-Air: (reported in SSCP report)	Records for 2 FCEs completed – not applicable

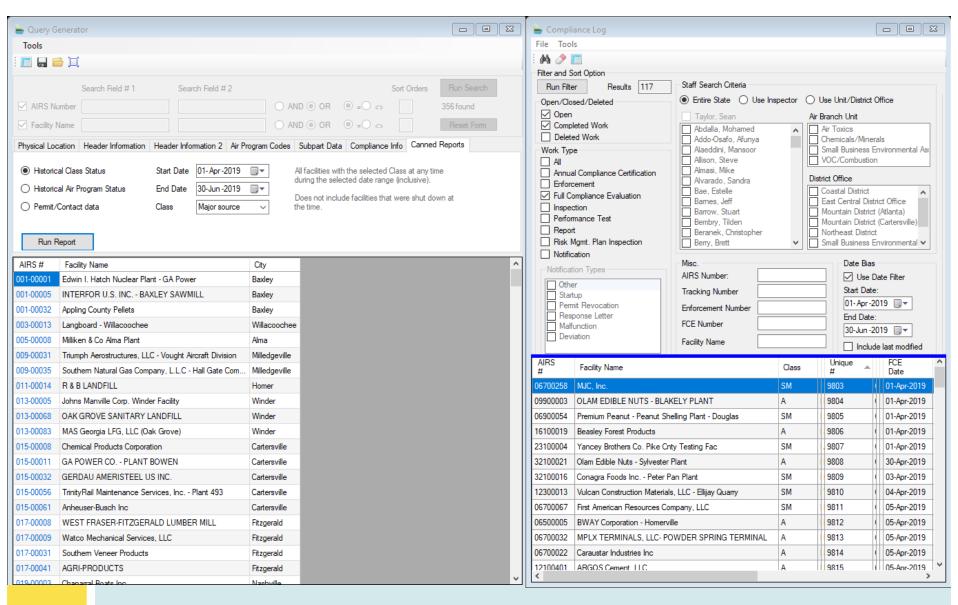


REQUIRED DATA

- Stationary Source Permitting Program
 - Active Major, Synthetic Minor, Minor Part 61, Title V Facilities
- Stationary Source Compliance Program
 - Inspections, Full Compliance Evaluations, Periodic Reports,
 Annual Compliance Certifications, Notices of Violation, Consent Orders
- Industrial Source Monitoring Unit
 - Stack tests that passed, failed, observed, unobserved
- District Offices
 - Inspections, Full Compliance Evaluations, Periodic Reports,
 Annual Compliance Certifications

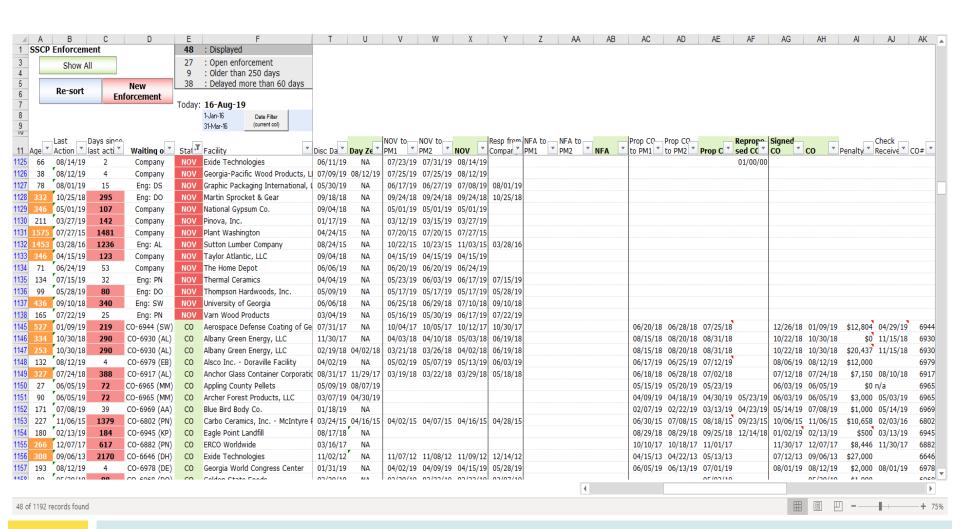


INTEGRATED AIR INFORMATION PLATFORM

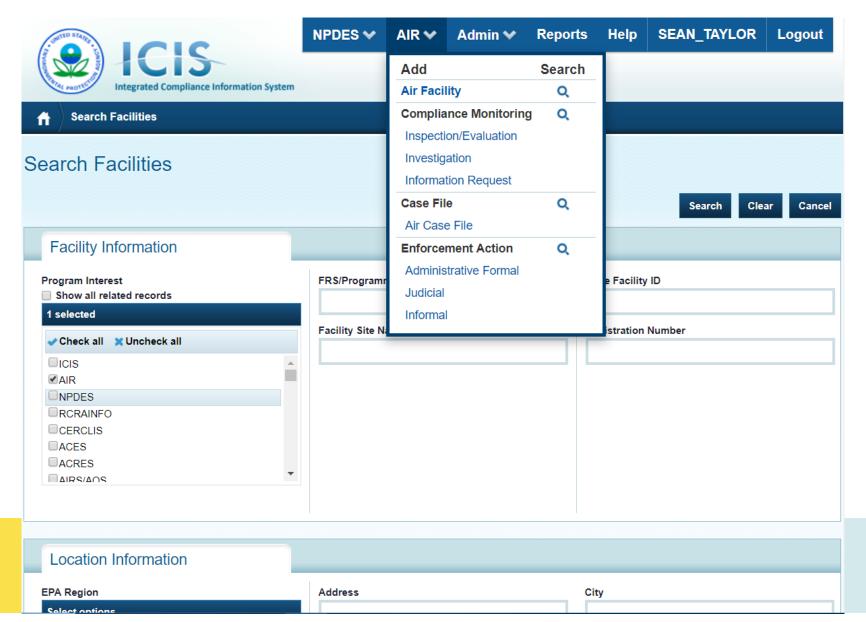




ENFORCEMENT LOG

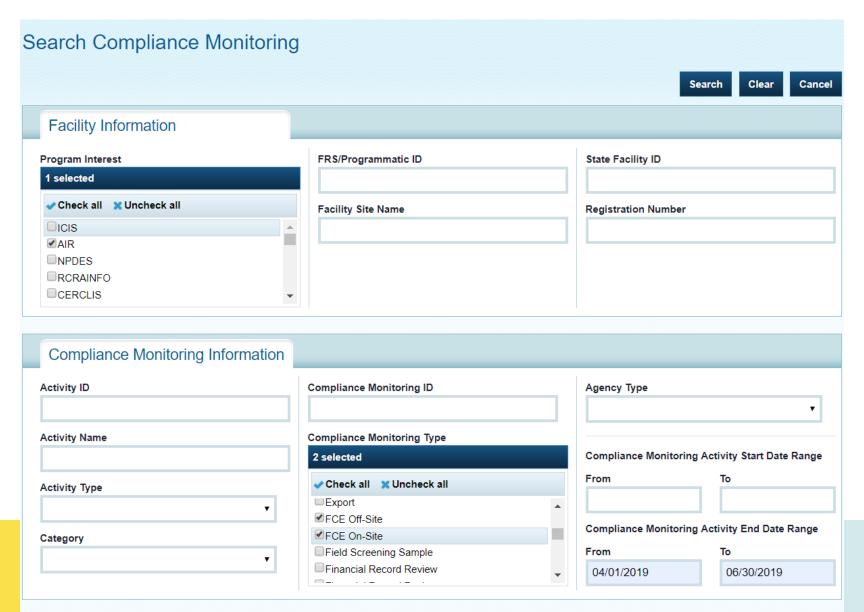






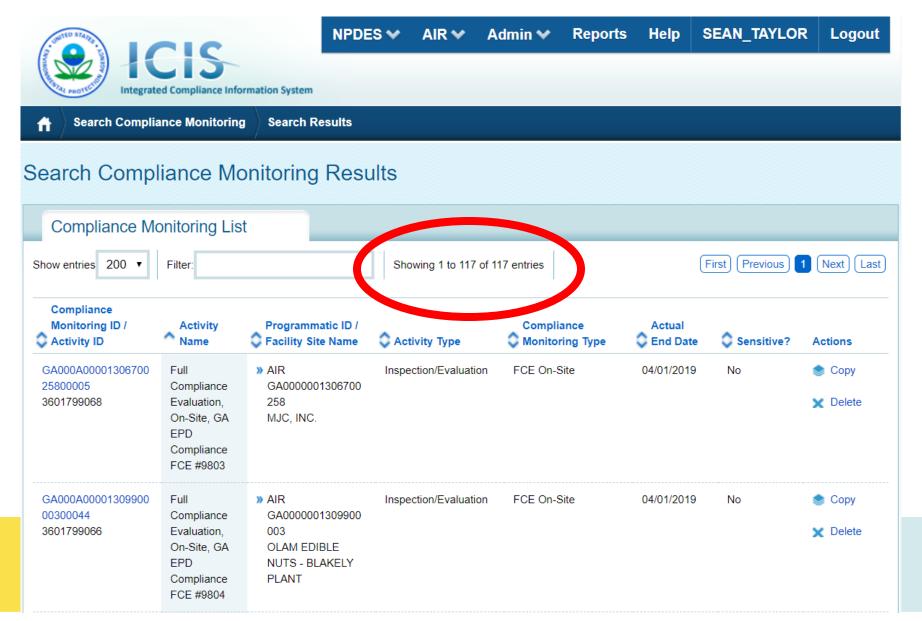


ICIS-AIR - COMPLIANCE ACTIONS



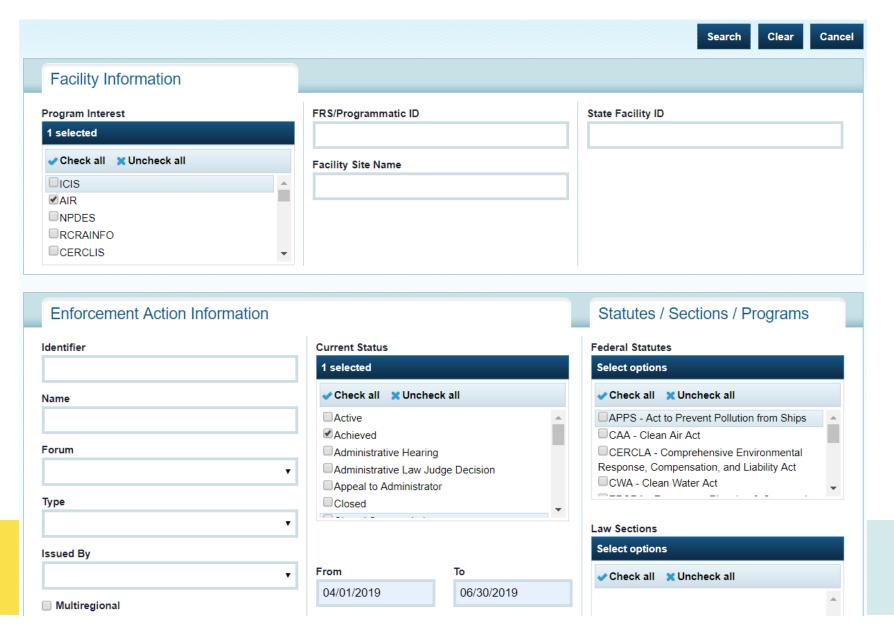


ICIS-AIR - COMPLIANCE ACTIONS



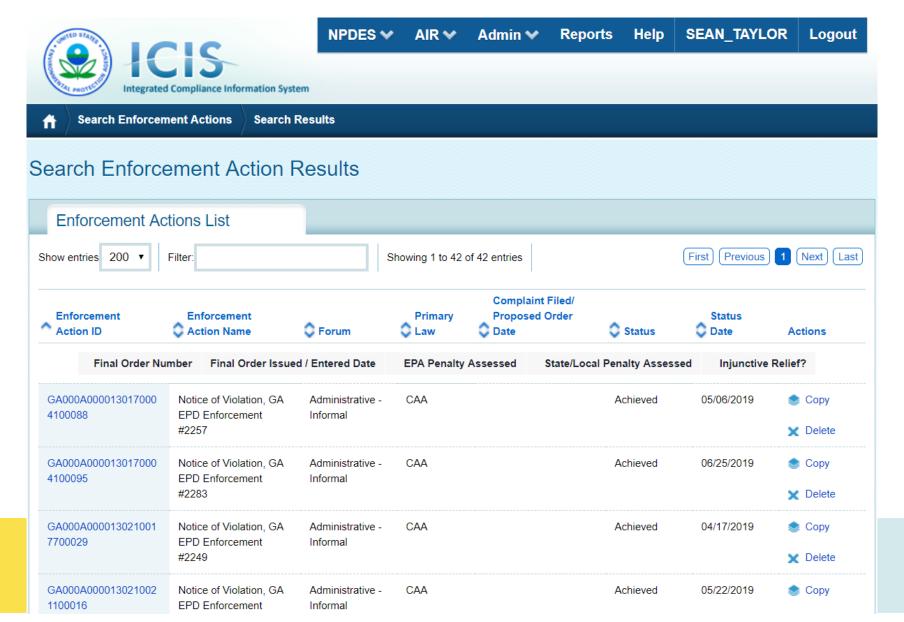


ICIS-AIR - ENFORCEMENT ACTIONS





ICIS-AIR - ENFORCEMENT ACTIONS







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Search Options

ECHO provides a variety of ways to identify facilities of interest. Search for facilities by media program using the links below or use media-specific tools to conduct additional analyses.

Cross Program

- All Data Facility Search
- Map Any Facilities with Enforcement and Compliance Data
- Corporate Compliance Screener ★

Water

- Water Facility Search
- NPDES Program Areas Facility Searches
 - Biosolids
 - o Industrial Stormwater
- Map Water Facilities
- Water Pollutant Loading Tool *
- Water Quality Indicators Map

Air

- Air Facility Search
- Map Air Facilities
- <u> Clean Air Tracking Tool (ECATT)</u>

 ★

Hazardous Waste

- Hazardous Waste Facility Search
- Map Hazardous Waste Facilities

Drinking Water

- <u>Drinking Water System Search</u>
- <u>Prinking Water Enforcement Targeting</u>
 Tool



SIC Code (Use to enter 3 or 4-digit codes)	SIC Code Lookup	Add More
NAICS Code		
Enter 2, 3, 4, 5, or 6-digit NAICS codes		Add More
Find NAICS Code By Keywo	ord v	
	CFC FIP MACT	A
MACT Subpart	No Restrictions	•
NSPS Subpart	•	
NSPS Subpart (Non-Major)	•	
Facility Status	No Restrictions All Active FacilitiesOperating	<u> </u>
Designation	No Restrictions Major Emissions Synthetic Minor Emissions	A
	No Restrictions Title V Major Mega-Site	<u> </u>

Search Criteria Selected			
Search Type			
Air			
Geographic Location			
State Georgia	×		
Facility Characteristics			
Facility Status All Active Facilities	×		
Designation Synthetic Minor Emissions	×		
Results View Interactive Map Table Search	•		





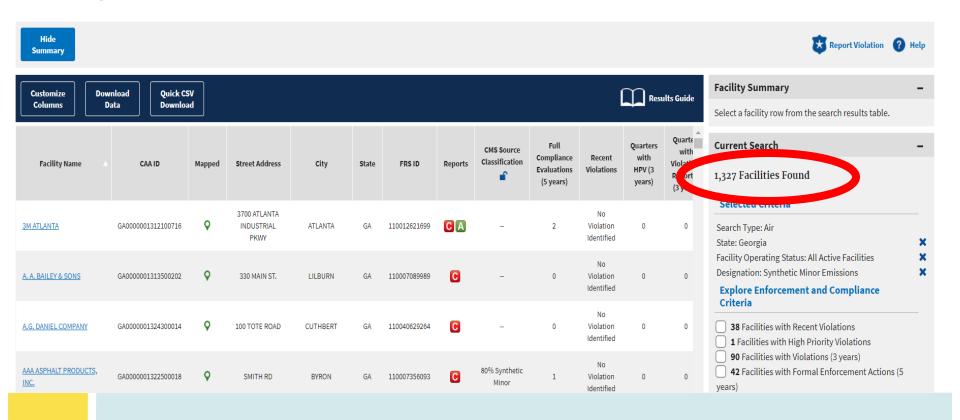
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CORRECTIVE ACTION PLAN

- The official threshold to implement a Corrective Action Plan is 10%; however, I look into every discrepancy
- Georgia EPD's Information Technology program is often brought in to investigate issues since data transfer is often the root cause
- In some cases, EPD IT has to contact EPA's data stewards to resolve data transfer issues
- Staff is re-trained on data entry requirements when required





RESULTS

- Better oversight by managers of expected and actual data entry
- More timely entry of enforcement actions through better tracking
- Improved programming logic in the Platform
- 100% accuracy of inspection, full compliance evaluation, annual compliance certification, and enforcement entries from Day 1 of Federal Fiscal Year 2018 annual data verification – stack test data lags slightly behind and permitting data is always being updated until final due date
- Any organization with electronic data transfer and the ability to query their own data with a date bias would be able to complete this task



ENVIRONMENTAL PROTECTION DIVISION

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