

October 11, 2005

MEMORANDUM

SUBJECT: Entering Manually Reported Federal Inspections into ICIS
in FY 2006

FROM: Phyllis P. Harris /s/
Deputy Assistant Administrator

TO: Deputy Regional Administrators

OECA is responsible for compiling information on all the compliance monitoring activities (e.g., inspections) that the Agency conducts each year and reporting this information to Congress and the public. We are asking for your support to improve data quality by changing the process for reporting Federal inspections¹ which are not part of an existing national data system. Beginning in FY 2006, the Regions should enter Federal inspections, which are now manually reported to OECA, into the Integrated Compliance Information System (ICIS). This change for FY 2006 is consistent with the consensus at the July 2005 Senior Enforcement Managers meeting among Regions and OECA on the need to reduce manual reporting.

Currently OECA collects and reports information on compliance inspections from two sources: 1) media specific data bases (e.g., AFS, PCS); and 2) manual reporting for programs which have no national database. In FY 2004, over 60% (~13,000) of the EPA inspection results were manually reported. Manual reporting of inspections is of limited value in that it only provides a summary number. Specifically, this summary number does not provide facility information, allow linkages to related actions, or the ability to determine reporting consistency.

We recognize that the Regions are organized differently and the responsibilities for conducting some inspections may be outside the Regional enforcement program. However, the

¹For purposes of this memo, the term inspection refers to the broader category of compliance monitoring activities. The Agency data standards defines an inspection as “ a visit to a facility for the purpose of gathering information to determine compliance including direct observations of facility operations”. We recognize that certain programs, such as the Air program, use the term evaluations instead of inspections to describe their compliance monitoring activities. We are requesting that all manual reporting of inspections and/or compliance evaluations be entered into ICIS.

Regional enforcement programs are responsible for collecting the information on these inspections at mid-year and end-of-year, which is then certified to by each of you and reported to OECA. Therefore, we are asking that you direct your Regional Enforcement Division Directors, Regional Media Division Directors, and senior staff to work with their appropriate Regional counterparts to implement this change. Working with the ICIS system administrators at both the Regional and Headquarters level will be key to ensuring a smooth transition.

Beginning in FY 2006, ICIS will become the official data base of record for all the Federal inspections and associated Inspection Conclusion Data Sheets (ICDS) listed in Table 1. This means that, beginning in FY 2006, OECA will pull Federal inspection and ICDS results for programs listed below in Table 1 from ICIS and will no longer accept manually reported inspections.

Table 1	
Program	# of FY 2004 EPA inspections/evaluations reported
RCRA Underground Storage Tanks	1,415
CWA Oil Spill Prevention (SPCC)	969
EPCRA non-313	672
CWA Wetlands	471
CAA Mobile Sources	801
CAA Asbestos and Demolition	276
SDWA PWSS Inspections*	N/A*
SDWA UIC	8,143
CWA Pretreatment Industrial Users (IUs)	158

* in 2005 this will not include sanitary surveys, in 2004 the Agency reported 358 PWSS “inspections”, most of which were sanitary surveys.

Federal inspections are defined as those conducted by EPA employees, EPA contractors, or EPA Senior Environmental Employees (SEE). The term “federal” does **not** include inspections conducted by states or tribes either under a grant, or where the state or tribe is using federal credentials. OECA will continue to pull Federal inspection results from the legacy databases (AFS, PCS, RCRAInfo) for the non-manually reported inspections.

All UIC inspections should be entered into ICIS unless the Region is part of the Office of Ground Water and Drinking Water (OGWDW) pilot. The UIC program is conducting a pilot in

FY 2006 of their new UIC data system. The UIC program is looking for a few Regions interested in participating in the pilot. If a Region is interested in piloting this system it will need to work directly with Jeff Bryan ((202) 564-3942) in OGWDW by no later than November 1, 2005. If a Region is approved to pilot the new UIC data system, OGWDW will directly provide OECA the inspections numbers for those selected Regions.

To assist in reporting inspections into ICIS, attached to this memo is an inspection data entry overview for your staff, which includes screen shots, step by step directions and staff contacts for additional assistance (See Attachment 1). Based on inspection numbers reported in FY 2004, entering this data should not be resource-intensive for any particular program or Region since there are only nine (9) required ICIS data fields for compliance monitoring, and the data entry workload can be spread over the course of a year as inspections and evaluations occur. Many Regions are already using ICIS to record at least some of these inspections.

Also, beginning in FY 2006, all of the inspection conducted in the previously manually reported categories must complete the Inspection Conclusion Data Sheet (ICDS). The ICDS is a one page form that captures: the number of deficiencies (potential violations) identified and communicated by the inspector; the actions taken by the facility to address the deficiencies; and compliance assistance provided by the inspector. Regions should enter the ICDS information directly into ICIS.

Over the last two years we have discussed eliminating manual reporting with both Regional and Headquarters staff and managers, from both the enforcement and program perspective. Entering these manually reported inspections into ICIS has received widespread support and we anticipate a smooth transition. If you have any questions, please contact your Regional ICIS System Administrators or David Hindin, Director, Enforcement Targeting and Data Division at (202) 564-1300.

Attachment

cc: Enforcement Division Directors
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