

State Review Framework

EPA Region 9 Pacific Islands
Direct Implementation
Round 2 Report for
Federal Fiscal Year 2010

Final 4/20/2015

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I. EXECUTIVE SUMMARY

OECA conducted the data and on-site file analysis for this review in 2010, but records for significant portions of the review were lost due to computer failure. Efforts to reconstruct the information and complete the report were further hampered by the loss of the staff that had conducted the review. As a result, this report was issued 4 years late, and is incomplete as it is missing the CAA and RCRA elements. Moreover Region 9 has restructured its enforcement program in 2012 and, in particular, has centralized the responsibility for compliance monitoring and enforcement in the Pacific Islands. OECA will conduct its next full review of R9's 2015 performance in 2016 in accordance with the SRF review schedule.

Summary of Programs Reviewed

II. Clean Water Act/National Pollutant Discharge Elimination System Program

The problems which necessitate state improvement:

- Data on formal and informal NPDES enforcement actions are not reported completely
- Violations are not well linked to relevant enforcement actions in ICIS
- Inspection report timeliness is well below the national goal of 100%
- Single event violations found in files reviewed are not reported in EPA databases

II. BACKGROUND INFORMATION ON STATE PROGRAM AND REVIEW PROCESS

The State Review Framework (SRF) is a program designed to ensure EPA conducts oversight of state and EPA direct implementation compliance and enforcement programs in a nationally consistent and efficient manner. Reviews look at 12 program elements covering data (completeness, timeliness, and quality); inspections (coverage and quality); identification of violations; enforcement actions (appropriateness and timeliness); and penalties (calculation, assessment, and collection).

Reviews are conducted in three phases: analyzing information from the national data systems; reviewing a limited set of state files; and development of findings and recommendations. Considerable consultation is built into the process to ensure EPA and the region understand the causes of issues, and to seek agreement on identifying the actions needed to address problems.

The reports generated by the reviews are designed to capture the information and agreements developed during the review process in order to facilitate program improvements. The reports are designed to provide factual information and do not make determinations of program adequacy. EPA also uses the information in the reports to draw a “national picture” of enforcement and compliance, and to identify any issues that require a national response. Reports are not used to compare or rank state programs.

A. GENERAL PROGRAM OVERVIEW

- **Agency structure:** EPA directly implements the NPDES program in the Pacific Islands through the Region 9 office in San Francisco, CA. Oversight of this directly implemented program is conducted by EPA headquarters.
- **Compliance/enforcement program structure:** Region 9’s Pacific Islands Office (PIO) consists of a manager and five staff and is responsible for coordinating all of Region 9’s environmental programs, including enforcement and compliance assurance, in the Pacific Islands. The PIO’s manager reports to the Director of the Communities and Ecosystems Division. The PIO also coordinates with the enforcement coordinator in the Region 9 Office of Planning and Public Affairs, and the compliance chiefs in the Air Division, Water Division, and the Waste Management Division.
- **Roles and responsibilities:**
The PIO staff conducts all of the NPDES inspections and staff in the Air and Waste Management Divisions conduct air and RCRA inspections. The Office of Regional Counsel takes the lead for follow-up enforcement actions. EPA Region 9 staff enter information directly in ICIS for Pacific Islands inspections, violations, and enforcement actions.
- **Data reporting systems/architecture:** EPA reports compliance monitoring and enforcement information in the Integrated Compliance Information System (ICIS). Region 9 also tracks information on FY 2009 stormwater non-major general permits in the eNOI database.

B. MAJOR STATE PRIORITIES AND ACCOMPLISHMENTS

- N/A

C. PROCESS FOR SRF REVIEW

- **Review period:** FY 2009
- **Key dates:**
 - *Data pull/PDA: September 13, 2010*
 - *On-site review: September 27-29, 2010*
 - *Draft report sent to region: 2014*
 - *OECA conducted the data and on-site file analysis for this review in 2010, but records for significant portions of the review were lost due to computer failure. Efforts to reconstruct the information and complete the report were further hampered by the loss of the staff that had conducted the review. As a result, this report is being issued extremely late (2015)*
- **Communication with the regional office:** EPA held a kick-off meeting with Region 9 in Summer 2010 to discuss the upcoming file review in September and review preliminary data analysis results. The region reviewed the data and provided comments captured in the Official Data Set. EPA held an opening meeting with EPA Region 9 staff in September 2010 to review the metrics that the Agency uses to evaluate quality of information available in inspection and enforcement files on data accuracy, inspection report quality and timeliness, violation identification, identification of significant noncompliance, promoting return to compliance through enforcement action, timely and appropriate enforcement, documentation of penalty calculation of economic benefit and gravity, changes to final penalties, and penalty collection. EPA reviewed findings from the on-site file review in the exit conference and sent the draft report to the regional office for review and comment. EPA Region 9 comments are included in the regional response section of the report in each findings table.

- **List regional and HQ lead contacts for review:**
 - Office of Compliance, SRF Team Leader: Sue Gilbertson
 - Office of Compliance File Reviewers: Sue Gilbertson, Allison Landsman, Rebecca Kane
 - Region 9 SRF Coordinator: Julie Anderson
 - Region 9: John McCarroll
 - Region 9: Rich Vaille
 - Region 9: Ken Greenberg
 - Region 9: Doug McDaniel

III. STATUS OF OUTSTANDING RECOMMENDATIONS FROM PREVIOUS REVIEWS

During the first SRF review of the Region 9 directly implemented Pacific Island’s compliance and enforcement programs, U.S. EPA identified a number of actions to be taken to address issues found during the review. The table below shows the actions that have not been completed at the time of the current SRF review. (Appendix A contains a comprehensive list of completed and outstanding actions for reference.)

State	Status	Due Date	Media	Element	Title	Finding
PI - Round 1	Working	12/28/2009	CAA	E1 , E9	Inspection Universe, Grant Commitments	Not all air, water, and waste inspections conducted in the Pacific Islands are captured in the annual commitments.
PI - Round 1	Working	12/31/2010	RCRA	E1	Inspection Universe	Guam EPA is not meeting inspection requirements
PI - Round 1	Long Term Resolution	9/30/2012	CAA	E2	Violations Identified Appropriately	Inspection reports are not complete.
PI - Round 1	Working	12/31/2010	RCRA	E2	Violations Identified Appropriately	Guam EPA inspection reports are not complete.
PI - Round 1	Working	12/31/2010	RCRA	E3	Violations Identified Timely	Inspection reports are not timely.
PI - Round 1	Working	12/31/2010	CAA	E3	Violations Identified Timely	Inspection reports are not always timely.
PI - Round 1	Long Term Resolution	12/31/2012	CAA	E4	SNC Accuracy	It is not clear that all HPVs are being identified
PI - Round 1	Working	12/31/2010	CWA	E4	SNC Accuracy	Single Event Violations are not being entered into the data system.
PI - Round 1	Working	12/28/2009	CAA	E1 , E9	Inspection Universe, Grant Commitments	Not all air, water, and waste inspections conducted in the Pacific Islands are
PI - Round 1	Working	12/31/2010	CWA	E4	SNC Accuracy	NPDES facilities in long-term SNC

IV. FINDINGS

Findings represent the EPA’s conclusions regarding the issue identified. Findings are based on the initial findings identified during the data or file review, as well as from follow-up conversations or additional information collected to determine the severity and root causes of the issue. There are four types of findings:

Finding	Description
Good Practices	This describes activities, processes, or policies that the SRF data metrics and/or the file reviews show are being implemented exceptionally well and which the state is expected to maintain at a high level of performance. Additionally, the report may single out specific innovative and noteworthy activities, processes, or policies that have the potential to be replicated by other states and can be highlighted as a practice for other states to emulate. No further action is required by either EPA or the state.
Meets SRF Program Requirements	This indicates that no issues were identified under this element.
Areas for State* Attention *Or, EPA Region’s attention where program is directly implemented.	<p>This describes activities, processes, or policies that the SRF data metrics and/or file reviews show are being implemented with minor deficiencies. The state needs to pay attention to these issues in order to strengthen performance, but they are not significant enough to require the region to identify and track state actions to correct.</p> <p>This can describe a situation where a state is implementing either EPA or state policy in a manner that requires self-correction to resolve concerns identified during the review. These are single or infrequent instances that do not constitute a pattern of deficiencies or a significant problem. These are minor issues that the state should self correct without additional EPA oversight. However, the state is expected to improve and maintain a high level of performance.</p>
Areas for State * Improvement – Recommendations Required *Or, EPA Region’s attention where a program is directly implemented.	This describes activities, processes, or policies that the metrics and/or the file reviews show are being implemented by the state that have significant problems that need to be addressed and that require follow-up EPA oversight. This can describe a situation where a state is implementing either EPA or state policy in a manner requiring EPA attention. For example, these would be areas where the metrics indicate that the state is not meeting its commitments, there is a pattern of incorrect implementation in updating compliance data in the data systems, there are incomplete or incorrect inspection reports, and/or there is an ineffective enforcement response. These would be significant issues and not merely random occurrences. Recommendations are required for these problems, and they must have well-defined timelines and milestones for completion. Recommendations will be monitored in the SRF Tracker.

Clean Water Act Program

Element 1 — Data Completeness: Degree to which the Minimum Data Requirements are complete.		
1-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	<p>Information reported on the universe of major facilities in the Pacific Islands is completely entered in ICIS for the American Samoa and Mariana Islands facilities. The universe of non-major facilities is completely entered by EPA for the Mariana Islands. Discharge monitoring reports are completely reported for all American Samoa facilities. Permit limits are well entered for Mariana Islands and American Samoa facilities.</p>
	Explanation	<p><i>Universe of Facilities</i> EPA accurately entered 4 major facilities in the American Samoa and 2 major facilities in the Mariana Islands. The two non-major individual permit facilities reported for the Mariana Islands are accurately entered for metric 1a3.</p> <p><i>Permit Limits</i> Permit limits are well entered for American Samoa and Mariana Islands major facilities with 100% of permit limits entered as indicated in Metric 1b1 below. There are some minor reporting issues with one missing permit limit not reported for one facility in FY 2009 in Guam due to a termination in progress at the time that the DMR information should have been reported.</p> <p><i>Discharge Monitoring Reports</i> Discharge monitoring reports are completely reported for all Pacific Islands major facilities as indicated in the results for Metric 1b2 shown below. DMR reporting for non-major facilities is well below 100% for Guam as indicated in metrics 1c2 and 1c3 in the Official Data Set on pp. 49, but this information is not required to be reported for non-major facilities.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 1a1 – Active facility universe: NPDES major individual permits (Current) (American Samoa): 4 major permits ▪ Metric 1a1 – Active facility universe: NPDES major individual permits (Current) (Mariana Islands): 2 major permits ▪ Metric 1a3 – Active facility universe: NPDES non-major individual permits (Current) (Mariana Islands): 2 non-major individual permits ▪ Metric 1b1 – Major individual permits: correctly coded limits (Current) (American Samoa) : 4/4 = 100% ▪ Metric 1b1 – Major individual permits: correctly coded limits (Current) (Guam): 5/6 = 83.3% ▪ Metric 1b1 – Major individual permits: correctly coded limits (Current) (Mariana Islands): 2/2 = 100% ▪ Metric 1b2 – Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr) (American Samoa): 8/8 = 100% ▪ Metric 1b2 – Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr) (Guam): 17/17 = 100% ▪ Metric 1b2 – Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr) (Mariana Islands): 6/6=100%

	Regional Response	
	Recommendation(s)	

Element 1 — Data Completeness: Degree to which the Minimum Data Requirements are complete.		
1-2	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input checked="" type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	A few facilities are not reported in the major and non-major facility universe for Guam.
	Explanation	<p>The universe of major and non-major facilities is not completely entered in ICIS by February 2010 based on metric results listed for metrics 1a1, 1a3 and 1a4 for Guam. The Region corrected this information for all currently active facilities that do not have terminated major or non-major individual permits, and the corrections are reflected in the appropriate Metric 1a1 major universe or Metric 1a3 non-major individual permit universe in the most recent frozen data available from FY 2012.</p> <p>The universe of non-major general permit facilities for the two stormwater industrial and stormwater construction non-major general permits was tracked by the region in a separate database, the eNOI database, in FY 2009. The Region provided downloaded information demonstrating that this information is available for compliance monitoring purposes at the time of the on-site file review. This information is not required to be completely reported in ICIS in FY 2009.</p> <p>The finding level selected is Area for State Attention because the number of facilities that are missing from the universe is quite small, and due to the fact that all active facilities are now represented in the most recent frozen data available for FY 2012 for metrics 1a1 and 1a3. The Region may wish to consider entering non-major general permits into ICIS to provide the opportunity for this information to be available to the public on the dashboards, and to demonstrate progress made in implementing this aspect of the NPDES program. Given the small universe size of 2 non-major general permits, it is not anticipated that this will significantly increase regional data entry workload significantly.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 1a1 – Active facility universe: NPDES major individual permits (Current) (Guam): 6 major permits ▪ Metric 1a3 – Active facility universe: NPDES non-major individual permits (Current) (American Samoa): 3 non-major individual permits ▪ Metric 1a3 – Active facility universe: NPDES non-major individual permits (Current) (Guam): 13 non-major individual permits ▪ Metric 1a4 – Active facility universe: NPDES non-major general permits (Current) (American Samoa, Guam, Mariana Islands): 0 non-major general permits
	Regional Response	
	Recommendation(s)	

Element 1 — Data Completeness: Degree to which the Minimum Data Requirements are complete.		
1-3	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input checked="" type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Some FY 2009 minimum data requirements for formal and informal federal enforcement actions in Guam are not complete in the data system of record, the Integrated Compliance Information System (ICIS). In addition, some inspection and enforcement files had missing inspection reports at the time of the on-site file review for American Samoa inspection and enforcement files.
	Explanation	<p>EPA reviewed 3 enforcement responses taken in Guam at major facilities that are not reported in the FY 2009 frozen data set. No enforcement actions are reported in Guam in FY 2009 under Metrics 1E2, 1F2, and 2b shown below. Two formal actions taken at major facilities and one informal action taken at a major facility in Guam were not reported in the frozen data for metrics 1E2 and 1F2 shown below. Entry of enforcement actions taken at major facilities are minimum ICIS data requirements.</p> <p>EPA found some inspection reports missing in regional inspection and enforcement files at the time of the on-site file review. Four inspection reports were missing from inspection and enforcement files for American Samoa facilities at the time of the on-site file review, and one file had inaccurate facility owner and address information entered in ICIS.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 1E2 – Informal actions: number of actions at major facilities (1 FY) (American Samoa, Guam, Mariana Islands): 0 informal actions ▪ Metric 1E4 – Informal actions: number of actions at non-major facilities (1 FY) (American Samoa, Guam, Mariana Islands): 0 informal actions ▪ Metric 1F2 Formal actions: number of actions at major facilities (1 FY) (Guam, American Samoa) : 0 formal actions ▪ Metric 1F2 Formal actions: number of actions at major facilities (1 FY) (Mariana Islands): 2 formal actions ▪ Metric 1F4 – Formal actions: number of actions at non-major facilities (1 FY) (American Samoa): 2 formal actions ▪ Metric 1F4 – Formal actions: number of actions at non-major facilities (1 FY) (Guam, Mariana Islands): 0 formal actions ▪ Metric 2B – Files reviewed where data is accurately reflected in the national data system (American Samoa): 2/7 = 28.6% accuracy ▪ Metric 2B – Files reviewed where data is accurately reflected in the national data system (Guam): 6/9 = 66.7% accuracy ▪ Metric 9a – Enforcement responses reviewed (American Samoa): 3 enforcement responses ▪ Metric 9a – Enforcement responses reviewed (Guam): responses: 6 enforcement responses ▪ Metric 9a – Enforcement responses reviewed (Mariana Islands): 2 enforcement responses

	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • EPA OECA will examine the accuracy of enforcement actions reported for major facilities in reviewing the timeliness and appropriateness of enforcement actions under SRF metric 10b during the third file review of the Pacific Islands enforcement program by 9/30/16 • EPA OECA will verify that all inspections found in files reviewed during the third review of the Pacific Islands compliance monitoring program are reported in ICIS under SRF metric 2b by 9/30/16 • The areas for improvement will be considered resolved once reviews (i.e., the 2016 SRF review or, if necessary, subsequent monitoring) indicate that all actions taken at major facilities are reported in frozen SRF data and when all inspections taken are reported on detailed facility reports during the third review compliance monitoring and enforcement in the Pacific Islands

Element 2 — Data Accuracy: Degree to which data reported in the national system is accurately entered and maintained.

2-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input checked="" type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Minimum data requirements for violations and enforcement actions are not accurately reported in ICIS. Inspection reports were missing from a number of files reviewed for FY 2009 inspections reported in ICIS.
	Explanation	<p>None of the 6 formal enforcement actions taken at major facilities in FY 2009 are linked in the ICIS database to violations associated with the enforcement action for facilities in the Mariana Islands. Zero enforcement actions are linked to violations for Pacific Islands facilities in FY 2009 as indicated by the metric value for metric 2a shown below. The two unreported Guam formal enforcement actions are also not linked to violations in ICIS. The national goal for linking enforcement actions to violations for major facilities is $\geq 80\%$, and 0% of the actions are linked in FY 2009.</p> <p>Findings from the file review indicate that 11 of the 19 files reviewed (57.9%) of the Pacific Islands inspection and enforcement files have data accurately entered in both the file reviewed and EPA's data system of record. Missing inspection reports are the primary reason for the low value for metric 2b. Four American Samoa files had missing inspection reports that were not in the file at the time of the on-site file review, and one file has an unreported single event violation, inaccurate facility owner, and address information.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 1E2– Informal actions: number of actions at major facilities (1 FY) (American Samoa, Guam, Mariana Islands): 0 informal actions ▪ Metric 1E4 – Informal actions: number of actions at non-major facilities (1 FY) (American Samoa, Guam, Mariana Islands): 0 informal actions ▪ Metric 1F2 Formal actions: number of actions at major facilities (1 FY) (Guam, American Samoa) : 0 formal actions ▪ Metric 1F2 Formal actions: number of actions at major facilities (1 FY) (Mariana Islands): 2 formal actions ▪ Metric 1F4– Formal actions: number of actions at non-major facilities (1 FY) (American Samoa): 2 formal actions ▪ Metric 1F4– Formal actions: number of actions at non-major facilities (1 FY) (Guam, Mariana Islands): 0 formal actions

	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 2A Actions linked to violations: major facilities (1 FY) (American Samoa, Guam): 0/0 = 0% ▪ Metric 2A Actions linked to violations: major facilities (1 FY) (Mariana Islands): 0/4 = 0% ▪ Metric 2B Files reviewed where data is accurately reflected in the national data system (American Samoa): 2/7 = 28.6% ▪ Metric 2B Files reviewed where data is accurately reflected in the national data system (Guam): 6/9 = 66.7% ▪ Metric 2B Files reviewed where data is accurately reflected in the national data system (Mariana Islands): 3/3 = 100% ▪ Metric 9a – Enforcement responses reviewed (American Samoa): 3 enforcement responses ▪ Metric 9a – Enforcement responses reviewed (Guam): responses: 6 enforcement responses ▪ Metric 9a – Enforcement responses reviewed (Mariana Islands): 2 enforcement responses
	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • Recommendations under Element 1 will address data accuracy issues found during the review of FY 2009 data

Element 3 — Timeliness of Data Entry: Degree to which the Minimum Data Requirements are timely.

3-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	No changes to FY 2009 performance results occurred after finalizing the frozen data set in February 2010 for American Samoa and Mariana Islands required data elements in ICIS.
	Explanation	Metric 3a examines the timeliness of data entry for minimum data requirements by comparing production data extracted from EPA data systems after the official deadline to finalize data for a given fiscal year. Changes indicate untimely data submitted after the end of the fiscal year. One hundred percent of the 28 performance metrics that contain required data show no changes to the metric results, indicating data are entered timely for Mariana Islands and American Samoa facilities. Twenty-six of 28 (92.9%) of Guam’s performance metrics have data that is entered timely. The two metrics with changes for Guam results include the universe of non-major individual permit facilities, metric 1a3, and the number of inspections reported for non-major individual permit facilities under metric 5b1. Changes also occurred for metric 1d1 on violations at non-major facilities in Guam, but this information is not required to be reported in ICIS in FY 2009.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 3A - Percent change in data metrics (American Samoa): 28/28 = 100% ▪ Metric 3A - Percent change in data metrics (Guam): 26/28 = 92.9% ▪ Metric 3A - Percent change in data metrics (Mariana Islands): 28/28 = 100%
	Regional Response	
	Recommendation(s)	

Element 4 — Completion of Commitments: Degree to which all enforcement/compliance commitments in relevant agreements are met and any products or projects are completed.

4-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	The finding level for Element 4 on completion of commitments is not applicable. The Region does not have a FY 2009 CMS plan to measure progress toward inspection commitments under SRF Element 4.
	Explanation	EPA does not have a CMS plan for the Pacific Islands for the directly implemented program. Inspection coverage is evaluated against national inspection coverage goals established under the Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy for the Core Program and Wet Weather Sources. See Element 5 on inspection coverage for additional details.
	Metric(s) and Quantitative Value(s)	N/A, no FY 2009 inspection commitments established under a CMS plan for the Pacific Islands.
	Regional Response	
	Recommendation(s)	

Element 5 — Inspection Coverage: Degree to which state completed the universe of planned inspections/compliance evaluations.

5-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Inspection coverage for major facilities is excellent for American Samoa and Mariana Islands with 100% inspection coverage at major facilities. Inspection coverage in Guam meets the 50% national goal, although both inspections remained unreported in frozen data.
	Explanation	<p><i>Major Facility Inspection Coverage:</i> EPA met the goals of the 2008 Clean Water Act National Pollutant Discharge Elimination System Compliance Monitoring Strategy for the Core Program and Wet Weather Sources to inspect at least 50% of the major facility universe in the Pacific Islands with 58.3% overall inspection coverage at 7 of the 12 major facilities in the Pacific Islands in FY 2009. EPA conducted 6 inspections at each major facility universe in the American Samoa and Mariana Islands in FY 2009 as shown below under metric 5a1 below. One unreported inspection at a major facility occurred that EPA discovered during the on-site file review, contributing to 16.7% inspection coverage for Guam’s universe of 6 major facilities. Recommendations pertaining to unreported inspections are addressed under Elements 1-3 on data completeness, accuracy, and timeliness.</p> <p><i>Non-major facility inspection coverage:</i> Inspection coverage at non-major individual permit facilities meets the 20% national CMS national goal for non-major facility universe inspection coverage. EPA conducted inspections at 5 of the 17 non-major individual permit facilities in American Samoa in FY 2009. While inspection coverage in Guam and the Mariana Islands is not at, or above, the 20% national goal in FY 2009, inspection coverage under metric 5b1 in Guam is much higher on a biennial basis with 9 of 13 facilities inspected (69%) in FY 2010 and FY 2012. Although no non-major inspections were reported under metric 5b1, 5b2, or 5c for the Mariana Islands in FY 2009, there is only one facility in the non-major universe, and it is not required to be inspected each year.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ 5a1 - Inspection coverage: NPDES majors (1 FY) (American Samoa): 4/4 = 100% ▪ 5a1 - Inspection coverage: NPDES majors (1 FY) (Guam): 0/6 = 0% ▪ 5a1 - Inspection coverage: NPDES majors (1 FY) (Mariana Islands): 2/2 = 100% ▪ 5b1 – Inspection coverage: NPDES non-major individual permits (1 FY) (American Samoa): 3/3 = 100% ▪ 5b1 – Inspection coverage: NPDES non-major individual permits (1 FY) (Guam): 2/13 = 15.4% ▪ 5b1 – Inspection coverage: NPDES non-major individual permits (1 FY) (Mariana Islands): 0/1 = 0% ▪ 5b2 – Inspection coverage: NPDES other (not 5a or 5b) (1 FY) (American Samoa, Mariana Islands): 0/0 ▪ 5b2 – Inspection coverage: NPDES other (not 5a or 5b) (1 FY) (American Samoa, Guam, Mariana Islands): 13/56 = 23.2%

	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 5C – Inspection coverage: NPDES other (not 5a or 5b) (1 FY) (American Samoa): 0/0 = N/A, no facilities in universe ▪ Metric 5C – Inspection coverage: NPDES other (not 5a or 5b) (1 FY) (Guam): 0/0 = N/A, no facilities in universe ▪ Metric 5C – Inspection coverage: NPDES other (not 5a or 5b) (1 FY) (Mariana Islands): 0/1 = 0%
	Regional Response	
	Recommendation(s)	

Element 6 — Quality of Inspection or Compliance Evaluation Reports: Degree to which inspection or compliance evaluation reports properly document observations, are completed in a timely manner, and include accurate description of observations.

6-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Inspection report quality is excellent and meets the 100% national goal for the Pacific Islands. All inspection reports reviewed provide sufficient documentation to determine compliance at the facility.
	Explanation	All Pacific Islands inspection reports were determined to be complete and provided sufficient documentation to determine compliance as shown below under metrics 6b and 6c. All 10 inspection reports reviewed for the American Samoa, Guam, and the Mariana Islands met the NPDES Inspection Manual standards for completeness. Inspection reports were well written and provided good documentation of inspector’s observations and findings on facility compliance.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ 6a - Inspection reports reviewed (American Samoa): 3 inspection reports ▪ 6a - Inspection reports reviewed (Guam): 5 inspection reports ▪ 6a - Inspection reports reviewed (Mariana Islands): 2 inspection reports ▪ 6b - Inspection reports reviewed that are complete. (American Samoa): 3/3 = 100% ▪ 6b - Inspection reports reviewed that are complete. (Guam): 5/5 = 100% ▪ 6b - Inspection reports reviewed that are complete. (Mariana Islands): 2/2 = 100% ▪ 6c - Inspection reports reviewed that provide sufficient documentation to determine compliance at the facility. (American Samoa): 3/3 = 100% ▪ 6c - Inspection reports reviewed that provide sufficient documentation to determine compliance at the facility. (Guam): 5/5 = 100% ▪ 6c - Inspection reports reviewed that provide sufficient documentation to determine compliance at the facility. (Mariana Islands): 2/2 = 100%
	Regional Response	
	Recommendation(s)	

Element 6 — Quality of Inspection or Compliance Evaluation Reports: Degree to which inspection or compliance evaluation reports properly document observations, are completed in a timely manner, and include accurate description of observations.

6-2	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input checked="" type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Inspection report timeliness does not meet the 100% national goal.
	Explanation	<p>The NPDES Inspection Manual calls for completion of inspection reports within 30 to 45 days. Non-sampling inspections are required to be completed within 30 days, while sampling inspections are to be completed within 45 days.</p> <p>One of 10 inspection reports reviewed was completed within 30-45 days. Thirty-three percent of American Samoa inspection reports, and none of the 7 Guam and Mariana Islands inspection reports are completed in a timely manner. The average length of time to complete inspection reports in files reviewed is 113 days for American Samoa inspection reports, 104 for Guam inspection reports, and 120 for Mariana Islands inspection reports. Many reports reviewed lacked management concurrence indicating the inspection report was deemed to be complete and final on a particular date.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ 6d – Inspection reports completed within the prescribed time frame. (American Samoa): 1/3 = 33.3% inspection report timeliness ▪ 6d – Inspection reports completed within the prescribed time frame. (Guam): 0/5 = 0% ▪ 6d – Inspection reports completed within the prescribed time frame. (Mariana Islands): 0/2 = 0%
	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • EPA will examine the timeliness of inspection report completion under SRF metric 6b during the third file review of the Pacific Islands enforcement program by 9/30/16 • The area for improvement will be considered resolved if the 2016 SRF review indicates inspection reports are completed within 30-45 days, or, if necessary, when subsequent monitoring indicates.

Element 7 — Identification of Alleged Violations: Degree to which compliance determinations are accurately made and promptly reported in the national database based upon compliance monitoring report observations and other compliance monitoring information.

7-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	EPA Region 9 met the national goal to have 100% of inspection reports leading to accurate compliance determinations.
	Explanation	All 10 inspection reports reviewed during the on-site file review led to accurate compliance determinations as shown below in the results for metric 7e. EPA reviewed 3 American Samoa, 5 Guam, and 2 Mariana Islands inspection reports all of which led to accurate compliance determinations.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 7e - Metric 7e - Inspection reports reviewed that led to a compliance determination (American Samoa): 3/3 = 100% ▪ Metric 7e - Inspection reports reviewed that led to a compliance determination (Guam): 5/5 = 100% ▪ Metric 7e - Inspection reports reviewed that led to a compliance determination (Mariana Islands): 2/2 = 100%
	Regional Response	
	Recommendation(s)	

Element 7 — Identification of Alleged Violations: Degree to which compliance determinations are accurately made and promptly reported in the national database based upon compliance monitoring report observations and other compliance monitoring information.

7-2	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input checked="" type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	EPA found a number of unreported single event violations during the on-site file review.
	Explanation	All 10 single event violations found in inspection and enforcement files reviewed as shown below under metric 8b were not reported for major and non-major facilities. No single event violations are reported at major and non-major facilities under metrics 7a1 and 7a2.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 7a1 - Single-event violations at majors (1 FY) (American Samoa, Guam, Mariana Islands): 0 SEVs ▪ Metric 7a2 - Single-event violations at non-majors (1 FY) (American Samoa, Guam, Mariana Islands): 0 SEVs ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (American Samoa): 3/3 = 100% SEV SNC compliance determination accuracy ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (Guam): 5/5 = 100% SEV SNC compliance determination accuracy ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (Mariana Islands): 2/2 = 100% SEV SNC compliance determination accuracy ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (American Samoa): 0/0 = N/A, no SEV SNCs ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (Guam): 0/4 = 0% ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (Mariana Islands): 0/2 = 0%
	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • Recommendations under element 8-2 will address missing single event violations

Element 8 — Identification of SNC and HPV: Degree to which the state accurately identifies significant noncompliance/high priority violations and enters information into the national system in a timely manner.

8-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	All of the inspection and enforcement files reviewed have accurate determinations of significant non-compliance for single event violations.
	Explanation	All 10 single event violations reviewed have accurate determination of significant non-compliance. Three American Samoa, 5 Guam, and 2 Mariana Islands single event violations show accurate significant non-compliance determinations as shown below in the results for metric 8b.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 1a1 - Active facility universe: NPDES major individual permits (Current) (American Samoa): 4 major permits ▪ Metric 1a1 - Active facility universe: NPDES major individual permits (Current) (Guam): 6 major permits ▪ Metric 1a1 - Active facility universe: NPDES major individual permits (Current) (Mariana Islands): 2 major permits ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (American Samoa): 3/3 = 100% SEV SNC compliance determination accuracy ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (Guam): 5/5 = 100% SEV SNC compliance determination accuracy ▪ Metric 8b - Verify that facilities with an SEV were accurately determined to be SNC or non-SNC (Mariana Islands): 2/2 = 100% SEV SNC compliance determination accuracy
	Regional Response	
	Recommendation(s)	

Element 8 — Identification of SNC and HPV: Degree to which the state accurately identifies significant noncompliance/high priority violations and enters information into the national system in a timely manner.

		<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	
	Explanation	
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (American Samoa): 0/0 = N/A, no SEV SNCs ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (Guam): 0/4 = 0% ▪ Metric 8c - Verify that SEVs that are SNC are timely reported (Mariana Islands): 0/2 = 0%
	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • EPA Region 9 will begin entering all SEVs for the Pacific Islands in FY 2013 and beyond effective immediately • EPA Region 9 will provide a list of all FY 2014 single event violations in inspection and enforcement files to EPA HQ for review against the FY 2014 frozen data set by 5/30/2015 • Region 9 will enter any missing FY 2014 single event violation data by 6/30/2015, which will be verified by a production data download by HQ by 7/30/2015

Element 9 — Enforcement Actions Promote Return to Compliance: Degree to which enforcement actions include required corrective action (i.e., injunctive relief or other complying actions) that will return facilities to compliance in a specific time frame.

9-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	Enforcement actions taken to address SNC violations at major facilities in the Pacific Islands promote return to compliance.
	Explanation	<p>EPA reviewed 12 FY 2009 enforcement actions during the on-site file review as indicated by metric 9a shown below.</p> <p>All six enforcement actions taken to address SNC violations in FY 2009 promote return to compliance in Guam and the Mariana Islands as shown below in the results for metric 9b. No SNC violations were reported in FY 2009 for major facilities in American Samoa, so there is no data to review for Metric 9b.</p> <p>Each of the nine enforcement actions taken in FY 2009 to address less significant noncompliance violations promote return to compliance. Enforcement actions taken to address violations at 3 American Samoa, 4 Guam, and 2 Mariana Islands facilities promote return to compliance as shown below under the results for metric 9c.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 9a - Enforcement responses reviewed (American Samoa): 3 enforcement actions ▪ Metric 9a - Enforcement responses reviewed (Guam): 6 enforcement actions ▪ Metric 9a - Enforcement responses reviewed (Mariana Islands): 2 enforcement actions ▪ Metric 9b - Responses that have returned or will return a source in SNC to compliance. (American Samoa): 0/0 = N/A, no enforcement responses; no SNC violations at major facilities ▪ Metric 9b - Responses that have returned or will return a source in SNC to compliance. (Guam): 4/4 = 100% ▪ Metric 9b - Responses that have returned or will return a source in SNC to compliance. (Mariana Islands): 2/2 = 100% ▪ Metric 9c - Responses that have returned or will return sources with non-SNC violations to compliance (American Samoa): 3/3 = 100% ▪ Metric 9c - Responses that have returned or will return sources with non-SNC violations to compliance (Guam): 4/4 = 100% ▪ Metric 9c - Responses that have returned or will return sources with non-SNC violations to compliance (Mariana Islands): 2/2 = 100%
	Regional Response	
	Recommendation(s)	

Element 10 — Timely and Appropriate Action: Degree to which state takes timely and appropriate enforcement actions in accordance with policy relating to specific media.

10-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input checked="" type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	EPA’s enforcement actions taken in the Mariana Islands are timely and appropriate responses to significant noncompliance violations and less significant violations in FY 2009.
	Explanation	<p>All of the enforcement actions reviewed for SNC and non-SNC violations at 2 Mariana Islands major facilities were timely and appropriate as shown below under Metrics 10a ,10b, 10c, 10d, and 10e.</p> <p>No significant noncompliance violations are reported in FY 2009 at American Samoa facilities, therefore, there is no data to evaluate for metrics 10a, 10b, or 10c for the American Samoa.</p>
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 8a2 – SNC rate: percent majors in SNC (1 FY) (American Samoa): 0/4 = 0% ▪ Metric 8a2 - SNC rate: percent majors in SNC (1 FY) (Mariana Islands): 2/2 = 100% ▪ Metric 10a - Major facilities without timely action (1 FY) (American Samoa): 0/4 = 0% ▪ Metric 10a - Major facilities without timely action (1 FY) (Mariana Islands): 0/2 = 0% ▪ Metric 10b - Enforcement responses reviewed that address SNC in a timely manner (American Samoa): 0/0 = N/A, no SNC violations reported in review year ▪ Metric 10b - Enforcement responses reviewed that address SNC in a timely manner (Mariana Islands): 2/2 = 100% ▪ Metric 10c - Enforcement actions reviewed that address SNC that are appropriate to the violations (American Samoa): 0/0 = N/A, no SNC violations reported in review year ▪ Metric 10c - Enforcement actions reviewed that address SNC that are appropriate to the violations (Mariana Islands): 2/2 = 100% ▪ Metric 10d - Enforcement responses reviewed that appropriately address non-SNC violations (Mariana Islands): 2/2 = 100% ▪ Metric 10e - Enforcement responses that address non-SNC violations in a timely manner (Mariana Islands): 2/2 = 100%
	Regional Response	
	Recommendation(s)	

Element 10 — Timely and Appropriate Action: Degree to which state takes timely and appropriate enforcement actions in accordance with policy relating to specific media.

10-2	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input checked="" type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	<p>Enforcement taken in response to significant noncompliance and less significant violations is not timely or appropriate for facilities in Guam. Enforcement responses taken in response to less significant violations in the American Samoa and Guam are not appropriate or timely. The percentage of major facilities with DMR violations reported in FY 2009 is high with 50-100% of facilities reporting DMR violations in American Samoa and Guam in FY 2009; the rate of significant non-compliance in Guam is high.</p>
	Explanation	<p>Non-compliance at major facilities is high in the American Samoa and Guam. The percentage of major facilities with DMR violations is fifty percent or greater in Guam and American Samoa. Two of four major facilities in American Samoa (50%) have DMR violations reported at major facilities as shown below in the results for metric 7D. All four major facilities (100%) in Guam have DMR violations reported in FY 2009. All of the four major facilities in Guam are in significant non-compliance as shown below in the metric results for metric 8a2, which is significantly above the national average of 22.4% in FY 2009.</p> <p>One of five FY 2009 federal enforcement actions taken in response to significant noncompliance violations at major facilities in Guam are not timely or appropriate. Four of 5 enforcement actions reviewed (80%) address SNC violations in a timely manner for facilities in Guam as shown in the result below for Metric 10b. Four of 5 enforcement actions reviewed (80%) address SNC appropriately through a formal enforcement response as shown below in the results for Metric 10c.</p> <p>EPA enforcement responses to less significant violations were generally timely and appropriate for Guam and American Samoa facilities as shown below in the metric results for metrics 10d and 10e. Three of three enforcement responses taken (100%) to address less significant violations are appropriate, and 2 of 3 of these enforcement responses (67%) are timely in American Samoa. Five of five enforcement responses (100%) address less significant violations appropriately, and 5 of 5 of these responses (100%) are taken in a timely manner for facilities in Guam.</p>
		<ul style="list-style-type: none"> ▪ Metric 7D – Percentage of major facilities with DMR violations (1 FY) (American Samoa): 2/4 = 50% of facilities with DMR violations ▪ Metric 7D – Percentage of major facilities with DMR violations (1 FY) (Guam): 4/4 = 100% of facilities with DMR violations ▪ Metric 8a1 – Major facilities in SNC (1 FY) (American Samoa): 0 facilities ▪ Metric 8a1 – Major facilities in SNC (1 FY) (Guam): 4 facilities ▪ Metric 8a2 – SNC rate: percent majors in SNC (1 FY) (Guam): 4/4 = 100% ▪ Metric 10a – Major facilities without timely action (1 FY) (Guam): 0/4 = 0% ▪ Metric 10b – Enforcement responses reviewed that address SNC in a timely manner (Guam): 4/5 = 80% ▪ Metric 10c – Enforcement actions reviewed that address SNC that are appropriate to the violations (Guam): 4/5 = 80%

	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 10d – Enforcement responses reviewed that appropriately address non-SNC violations (American Samoa): 3/6 = 50% ▪ Metric 10d – Enforcement responses reviewed that appropriately address non-SNC violations (Guam): 5/6 = 83.3% ▪ Metric 10e – Enforcement responses that address non-SNC violations in a timely manner (American Samoa): 2/6 = 33.3% ▪ Metric 10e – Enforcement responses that address non-SNC violations in a timely manner (Guam): 4/6 = 66.7%
	Regional Response	
	Recommendation(s)	<ul style="list-style-type: none"> • EPA will review timeliness of enforcement responses in FY 2015 frozen data using SRF metric 10a1 to determine whether improvements are successfully implemented by 3/30/2016

Element 11 — Penalty Calculation Method: Degree to which state documents in its files that initial penalty calculation includes both gravity and economic benefit calculations, appropriately using the BEN model or other method that produces results consistent with national policy.

11-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	N/A, no formal enforcement actions with penalties reported in FY 2009.
	Explanation	N/A, no formal enforcement actions with penalties reviewed during the on-site file review.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 11a - Penalty calculations reviewed that consider and include where appropriate gravity and economic benefit. (American Samoa, Guam, Mariana Islands): 0/0 = N/A, no actions with penalties in FY 2009
	Regional Response	
	Recommendation(s)	

Element 12 — Final Penalty Assessment and Collection: Degree to which differences between initial and final penalty are documented in the file along with a demonstration in the file that the final penalty was collected.

12-1	This finding is a(n)	<input type="checkbox"/> Good Practice <input type="checkbox"/> Meets SRF Program Requirements <input type="checkbox"/> Area for State Attention <input type="checkbox"/> Area for State Improvement – Recommendations Required
	Finding	N/A, no formal enforcement actions with penalties reported in FY 2009.
	Explanation	N/A, no formal enforcement actions with penalties reviewed during the on-site file review.
	Metric(s) and Quantitative Value(s)	<ul style="list-style-type: none"> ▪ Metric 12a - Document the rationale for differences between the initial proposed penalty amount and final assessed penalty that was collected. (American Samoa, Guam, Mariana Islands): 0/0 = N/A, no formal enforcement actions with penalties in FY 2009 ▪ Metric 12b – Penalties collected (American Samoa, Guam, Mariana Islands): 0/0 = N/A, no formal enforcement actions with penalties in FY 2009
	Regional Response	
	Recommendation(s)	

V. ELEMENT 13 SUBMISSION

[If recognition credit or resource flexibility requested, describe here and attach relevant state and EPA documentation.]

APPENDIX A: STATUS OF RECOMMENDATIONS FROM PREVIOUS REVIEWS

During the first SRF review of the EPA Region 9 Pacific Island's compliance and enforcement programs, EPA identified a number of actions to be taken to address issues found during the review. The table below shows the status of progress toward completing those actions.

State	Status	Due Date	Media	Element	Title	Finding
PI - Round 1	Working	12/28/2009	CAA	Inspection Universe, Grant Commitments	Not all air, water, and waste inspections conducted in the Pacific Islands are captured in the annual commitments.	Region 9 conducts inspections at as many air, water, and waste facilities as possible, but is not getting credit for those inspections due to a lack of reporting including the ACS. Region 9 should identify the inspection commitments for air, water, and RCRA in Guam, American Samoa, and CNMI in the comments field in ACS. The RCRA commitments would only be for TSDFs and LQGs inspections. The CWA and CAA commitments would be listed after they those inspections are identified by the programs. The accomplishments should then be identified in the end of year ACS reporting. This should be coordinated by the Region 9 enforcement coordinator in conjunction with the staff of PIO and the other media compliance units.
PI - Round 1	Working	12/31/2010	RCRA	Inspection Universe	Guam EPA is not meeting inspection requirements	Region 9 RCRA program should work with the Guam EPA to develop a plan for meeting the five year LQG inspection standard in Guam.

PI - Round 1	Long Term Resolution	9/30/2012	CAA	Violations Identified Appropriately	Inspection reports are not complete.	The Region 9 air compliance monitoring reports should be complete and consistent with the requirements of the CMS. The reports should set an example for the inspectors in the Guam EPA to follow. The air compliance program needs to have a process in place to show how Full Compliance Evaluations and Partial Compliance Evaluations conducted in the Pacific Islands meet the requirements of the air program's CMS.
PI - Round 1	Working	12/31/2010	RCRA	Violations Identified Appropriately	Guam EPA inspection reports are not complete.	Region 9 RCRA program should work with the Guam EPA RCRA inspectors to improve their inspection reports. For example, this could include using an on-the-job training format or helping the Guam EPA inspectors to obtain inspector training provided by EPA.

State	Status	Due Date	Media	Element	Title	Finding
PI - Round 1	Completed	9/30/2008	CWA	Violations Identified Appropriately	Inspection reports are not always complete.	Region 9 should begin to prepare inspection reports for each NPDES inspection conducted in the Pacific Islands territories. The reports should use the form 3560 as the cover sheet for the inspection report. This issue was discovered during the preliminary review of the PIO program before the on-site visit. PIO is aware of this problem and has indicated that they will take steps to correct it. This may require coordination with the Region 9 NPDES compliance branch to ensure that PIO inspectors have the latest requirements for documenting inspections. PIO inspectors should take advantage of inspector training provided by EPA.
PI - Round 1	Working	12/31/2010	RCRA	Violations Identified Timely	Inspection reports are not timely.	Region 9 (PIO and the air, water, and waste compliance units) should improve the length of time that it takes to prepare inspections reports. Specifically: Given the time and distances involved, and the potential need to obtain additional information through the section 3007 process, traditional timelines are not reasonable. Also, it is understood that it is a challenge for one inspector to prepare so many reports within the 30 or 45 day time frame. However, it may be possible for the Region to improve its efficiency in preparing these reports. OECA suggests that the Region 9 RCRA program assess the timeliness of preparing reports for inspections conducted in Guam and establish reasonable reporting standards.

PI - Round 1	Working	12/31/2010	CAA	Violations Identified Timely	Inspection reports are not timely.	Region 9 (PIO and the air, water, and waste compliance units) should improve the length of time that it takes to prepare inspections reports. Specifically: Given the time and distances involved, and the potential need to obtain additional information through the section 3007 process, traditional timelines are not reasonable. Also, it is understood that it is a challenge for one inspector to prepare so many reports within the 30 or 45 day time frame. However, it may be possible for the Region to improve its efficiency in preparing these reports. OECA suggests that the Region 9 RCRA program assess the timeliness of preparing reports for inspections conducted in Guam and establish reasonable reporting standards.
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State	Status	Due Date	Media	Element	Title	Finding
PI - Round 1	Long-Term Resolution	12/31/2012	CAA	SNC Accuracy	It is not clear that all HPVs are being identified	Region 9 air compliance program needs to be making critical assessments of the Compliance Monitoring Reports and FCEs to ensure that HPVs are properly identified and addressed. If there are SO2 non-attainment areas in Guam and CNMI, there may be HPVs that have not been identified. In conjunction with the recommendation under Element 2 regarding completeness of CMRs and FCEs, Region 9's air program should have a process in place to ensure that reports are complete and that HPVs are properly identified.
PI - Round 1	Working	12/31/2010	CWA	SNC Accuracy	Single Event Violations are not being entered into the data system.	The Region needs to begin entering single event violations in the CWA NPDES program into ICIS-NPDES. However, at this time, this requirement is pending the issuance of the ICIS-NPDES Policy Statement.
PI - Round 1	Working	Working	CWA	SNC Accuracy	NPDES facilities in long-term SNC	The Region needs to review NPDES facilities with long-term SNC determinations to assess what enforcement actions may be required to bring them into compliance.
PI - Round 1	Completed	12/31/2007	CAA	Return to Compliance	Not all PIO enforcement actions are entered into ICIS.	PIO and the Region 9 enforcement coordinator should establish communications in order to ensure that enforcement data is entered into ICIS and to leverage resources for travel and equipment.
PI - Round 1	Completed	03/31/2008	CWA	Data Timely, Data Complete	DMR reporting rate is below the standard.	Region 9 should ensure that the DMR reporting rate improves for the NPDES programs in the Pacific Islands.

APPENDIX B: OFFICIAL DATA PULL

American Samoa FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			4	NA	NA	NA	4	NA	NA	NA
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			1	NA	NA	NA	1	NA	NA	NA
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA
P01B1C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	4	4	0	100%	4	4	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
C01B2C	Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	8	8	0	100%	8	8	0
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	4	4	0	100%	4	4	0
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0 / 0	0	0	0	0 / 0	0	0	0
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	1	1	0	100%	1	1	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			100%	5	5	0	100%	5	5	0
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			100%	1	1	0	100%	1	1	0
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	1	1	0%	0	1	1
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0/0	0	0	0	0/0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01E3E	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01F1E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0 / 0	0	0	0	0 / 0	0	0	0
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	100%	4	4	0	100%	4	4	0
P05B1E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			100%	1	1	0	100%	1	1	0
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0 / 0	0	0	0	0 / 0	0	0	0
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	0 / 0	0	0	0	0 / 0	0	0	0
P07C0C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined		26.3%	0 / 0	0	0	0	0 / 0	0	0	0
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	50%	2	4	2	50%	2	4	2

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA
P08A2C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		22.4%	0%	0	4	4	0%	0	4	4
P10A0C	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.5%	0%	0	4	4	0%	0	4	4

Guam FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			4	NA	NA	NA	4	NA	NA	NA
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			12	NA	NA	NA	10	NA	NA	NA
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01B1C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	4	4	0	100%	4	4	0
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
C01B2C	Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	11	11	0	100%	11	11	0
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	4	4	0	100%	4	4	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0%	0	4	4	0%	0	4	4
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	8	8	0	100%	8	8	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			45.5%	5	11	6	45.5%	5	11	6
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			22.2%	2	9	7	22.2%	2	9	7
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	12	12	0%	0	10	10
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0/0	0	0	0	0/0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E3E	Informal actions: number of mom-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F1E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0 / 0	0	0	0	0 / 0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	0%	0	4	4	0%	0	4	4
P05B1E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			8.3%	1	12	11	0%	0	10	10

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0 / 0	0	0	0	0 / 0	0	0	0
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA
P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	0 / 0	0	0	0	0 / 0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P07C0C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined		26.3%	0 / 0	0	0	0	0 / 0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	100.0%	4	4	0	100.0%	4	4	0
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			4	NA	NA	NA	4	NA	NA	NA
P08A2C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		22.4%	100.0%	4	4	0	100.0%	4	4	0
P10A0C	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.5%	100.0%	4	4	0	100.0%	4	4	0

Mariana Islands FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			2	NA	NA	NA	2	NA	NA	NA
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			2	NA	NA	NA	2	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01B1C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	1	1	0	100%	1	1	0
C01B2C	Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	6	6	0	100%	6	6	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	2	2	0	100%	2	2	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0%	0	2	2	0%	0	2	2
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	1	1	0	100%	1	1	0
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			100%	3	3	0	100%	3	3	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			50%	1	2	1	50%	1	2	1
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	2	2	0%	0	2	2
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0/0	0	0	0	0/0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01E3E	Informal actions: number of mom-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01F1E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0%	0	4	4	0%	0	4	4

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	100%	2	2	0	100%	2	2	0
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P05B1E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			0%	0	1	1	0%	0	1	1
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0%	0	1	1	0%	0	1	1
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA
P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	100%	1	1	0	100%	1	1	0

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P07C0C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined		26.3%	0%	0	1	1	0%	0	1	1
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	100%	2	2	0	100%	2	2	0
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			2	NA	NA	NA	2	NA	NA	NA
P08A2C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		22.4%	100%	2	2	0	100%	2	2	0
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen
P10A0C	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.5%	0%	0	2	2	0%	0	2	2

APPENDIX C: PDA TRANSMITTAL LETTER

Appendices C, D, and E provide the results of the Preliminary Data Analysis (PDA). The Preliminary Data Analysis forms the initial structure for the SRF report, and helps ensure that the data metrics are adequately analyzed prior to the on-site review.

This is a critical component of the SRF process because it allows the reviewers to be prepared and knowledgeable about potential problem areas before the on-site review. In addition, it gives the region focus during the file reviews and/or basis for requesting supplemental files based on potential concerns raised by the data metric results.

This section, Appendix C, contains the letter transmitting the results of the Preliminary Data Analysis to the state. This letter identifies areas that the data review suggests the need for further examination and discussion during the review process.

September 20, 2010

Julie Anderson

SRF Coordinator

EPA Region 9

75 Hawthorne Street

Room # 19130

San Francisco, CA 94105

Dear Julie:

In our opening letter on September 13, 2010, EPA's Office of Enforcement and Compliance Assurance (OECA) notified EPA Region 9 of its intention to begin the State Framework Review of Regions 9's Clean Water Act NPDES and Clean Air Act Enforcement Programs in the Pacific Islands. As noted, the base year for review will be federal fiscal year 2009. Thank you for providing the requested information and your response to the official data metrics results sent on September 13, 2010. OECA has analyzed the data against set goals and commitments, and with this letter, are transmitting our analysis and the file selection to you.

This follow-up letter includes our preliminary analysis of the EPA Region data metrics results, the official data metrics results spreadsheet(s) with any EPA Region-provided data corrections/discrepancies, our focus areas for the upcoming on-site file review, and the files that have been selected for review.

In this transmittal, we also are outlining any specific conditions or information that we are aware of and may be relevant to the review (for example, credits under Element 13, special situations regarding data flow, etc). We are providing this information to you in advance so that you have adequate time to compile

the files that we will review and can begin pulling together any supplemental information that you think may be of assistance during the review. After reviewing the enclosed information, if there are additional circumstances that OECA should consider during the review, please provide that information to us prior to the on-site file review.

OECA has established a cross program team of managers and senior staff to implement the Region 9 review. Melissa Saddler will be OECA's primary contact for the review. She will lead the review team, directing all aspects of the review for the region. Susan Gilbertson is OECA's SRF Team Leader with overall responsibility for the review. The NPDES program expert on the review team will be Allison Donohue. All team members will perform their onsite review of Regions 9's Pacific Islands Enforcement Program of Idaho beginning September 27, 2010 and ending September 30, 2010. OECA is requesting that a room with secure Internet accessibility be available.

Please note that the enclosed preliminary findings are based only on the data metrics results themselves. Final findings may be significantly different based upon the results of the file review and ongoing discussions with you and your staff. If you have any questions about the process that we intend to use, please contact Melissa Saddler.

All information and material used in this review may be subject to federal and/or state disclosure laws. While EPA intends to use this information only for discussions with EPA Region 9, it may be necessary to release information in response to a properly submitted request.

Sincerely,

Chris Knopes, Director, NPMAS

Enclosure 1 – PI Preliminary Data Analysis of EPA Region's SRF Data Metrics

Enclosure 2 – PI Data Metrics Preliminary Data Analysis Worksheet

Enclosure 3 – PI Explanation of File Selection

Enclosure 4 – PI Table of Selected Files

cc: Lisa Lund, Director, Office of Compliance
David Hindin, Deputy Director, Office of Compliance

APPENDIX D: PRELIMINARY DATA ANALYSIS CHART

III. Preliminary Data Analysis of EPA Region's Data Metrics Results

This section provides the results of the Preliminary Data Analysis (PDA). The Preliminary Data Analysis forms the initial structure for the SRF report and helps ensure that the data metrics are adequately analyzed prior to the on-site review. This is a critical component of the SRF process because it allows the reviewers to be prepared and knowledgeable about potential problem areas before initiating the on-site portion of the review. In addition, it gives the region focus during the file reviews and/or basis for requesting supplemental files based on potential concerns raised by the data metrics results.

The PDA reviews each data metric and evaluates state performance against the national goal or average, if appropriate. The PDA chart in this section of the SRF report only includes metrics where potential concerns or areas of exemplary performance are identified. (The full PDA worksheet in Appendix E contains every metric: positive, neutral, or negative.) Initial Findings indicate the observed results. Initial Findings are preliminary observations. They are used as a basis for further investigation that takes place during the file review and through dialogue with the state. Final Findings are developed only after evaluating them against the file review results where appropriate, and dialogue with the state have occurred. Through this process, Initial Findings may be confirmed, modified, or determined not to be supported. Findings are presented in Section IV of this report.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric	American Samoa Count Frozen Data	American Samoa Universe Frozen Data	Initial Findings
1D3	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E1	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E2	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E3	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E4	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F1	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F2	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G1	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G2	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G3	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G4	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G5	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0			This may be accurate based on the low facility universe, but it could also be a data entry issue.
2A	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥80%		0/0			This may be accurate based on the low facility universe, but it could also be a data entry issue.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric	American Samoa Count Frozen Data	American Samoa Universe Frozen Data	Initial Findings
7A1	Single-event violations at majors (1 FY)	Review Indicator	Combined			0			It appears that the region may not be entering SEVs.
7A2	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0			It appears that the region may not be entering SEVs.
7B	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		28%	0/0			This metric concerns compliance schedules found in enforcement actions. The indication is that all have been resolved and are on schedule. The problem is that there is a zero (0) in the denominator, which should be the number of compliance schedules issued.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric	Guam Count Frozen Data	Guam Universe Frozen Data	Initial Findings
1C2	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			45.5%	5	11	DMR entry late seems low for non-majors
1C3	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			22.2%	2	9	DMR entry late seems low for non-majors.
1D2	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0 / 0	0	0	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1D3	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E1	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E2	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E3	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E4	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F1	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F2	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F3	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F4	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G1	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric	Guam Count Frozen	Guam Universe Frozen Data	Initial Findings
1G2	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G3	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G4	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G5	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	N/A	N/A	This may be accurate based on the low facility universe, but it could also be a data entry issue.
2A	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0 / 0	0	0	This may be accurate based on the low facility universe, but it could also be a data entry issue.
5A	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	0.0%	0	4	There does not seem to be any inspections being completed.
5B1	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			0%	0	10	There does not seem to be any inspections being completed.
5B2	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	There does not seem to be any inspections being completed.
5C	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0	0	0	There does not seem to be any inspections being completed.
7A1	Single-event violations at majors (1 FY)	Review Indicator	Combined			0			It appears that the region may not be entering SEVs.
7A2	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0			It appears that the region may not be entering SEVs.
7B	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		28.2%	0 / 0	0	0	This metric concerns compliance schedules found in enforcement actions. The indication is that all have been resolved and are on schedule. The problem is that there is a zero (0) in the denominator, which should be the number of compliance

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric	Guam Count Frozen	Guam Universe Frozen	Initial Findings
8A1	Major facilities in SNC (1 FY)	Review Indicator	Combined			4	N/A	N/A	4 facilities in SNC appears to be high.
8A2	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		23.2%	100.0%	4	4	High SNC rate.
10A	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.6%	100.0%	4	4	There seems to be no action in SNC cases.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric	Mariana Islands Count Frozen	Mariana Islands Universe Frozen	Initial Findings
1D1	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0.0%	0	2	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1D2	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 FY)	Informational Only	Combined			0 / 0	0	0	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1D3	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E1	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E2	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E3	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1E4	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F3	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1F4	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G1	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G2	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G3	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G4	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.
1G5	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	This may be accurate based on the low facility universe, but it could also be a data entry issue.

Original Data Pulled from Online Tracking Information System (OTIS)									EPA Preliminary Analysis
CWA Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric	Mariana Islands Count Frozen	Mariana Islands Universe Frozen	Initial Findings
2A	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥80%		0%	0	4	This may be accurate based on the low facility universe, but it could also be a data entry issue.
7A1	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	It appears that the region may not be entering SEVs.
7A2	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	It appears that the region may not be entering SEVs.
7B	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		28.2%	100%	1	1	Though it is only 1, this accounts for all compliance violations being unresolved.
7D	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		53.0%	100%	2	2	Large percentage of major facilities with violations should be analyzed since it is a small universe.
8A1	Major facilities in SNC (1 FY)	Review Indicator	Combined			2	NA	NA	2 facilities is high for such a small universe.
8A2	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		23.2%	100.0%	2	2	100% facilities in SNC is high for such a small universe.

APPENDIX E: PDA WORKSHEET (with State and EPA Comments)

American Samoa FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			4	NA	NA	NA	4	NA	NA	NA		
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA		
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			1	NA	NA	NA	1	NA	NA	NA	3	Correct active universe is 3; data set doesn't include 2 permits: AS0020036 (BP Southwest Marine) & AS0020044 (Satala Power Plant); all 3 permits are entered in ICIS.

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA	2	The region has 2 stormwater general permits (1 industrial, 1 construction). There are 2 dischargers filed under the stormwater construction permit and 2 dischargers filed under the stormwater industrial permit. The 2 permits are entered and tracked in ICIS. Region 9 tracks the universe of individual filers with EPA's eNOI system rather than ICIS, as allowed in this metric's description.

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01B1C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	4	4	0	100%	4	4	0		
C01B2C	Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	8	8	0	100%	8	8	0		
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	4	4	0	100%	4	4	0		
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0 / 0	0	0	0	0 / 0	0	0	0		
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	1	1	0	100%	1	1	0	3	Correct active universe is 3; data set doesn't include 2 permits: AS0020036 (BP Southwest Marine) & AS0020044 (Satala Power Plant); all 3 permits are coded correctly in ICIS
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			100%	5	5	0	100%	5	5	0	12	Correct universe is 12 DMRs for 3 permits; data set doesn't include 2 permits: AS0020036 (BP Southwest Marine—3 DMRs)& AS0020044 (Satala Power Plant—4 DMRs) plus AS0020028 (Utelei Petroleum—5); all 12 DMRs are entered into ICIS

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			100%	1	1	0	100%	1	1	0		Correct active universe is 3; data set doesn't include 2 permits: AS0020036 (BP Southwest Marine) & AS0020044 (Satala Power Plant); all 3 permits are coded correctly in ICIS
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	1	1	0%	0	1	1		
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0 / 0	0	0	0	0 / 0	0	0	0		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E3E	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F1E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA		
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA		
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0 / 0	0	0	0	0 / 0	0	0	0		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	100%	4	4	0	100%	4	4	0		
P05B1E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			100%	1	1	0	100%	1	1	0	3	Correct active universe is 3; data set doesn't include 2 permits: AS0020036 (BP Southwest Marine—inspected 4/27/2009) & AS0020044 (Satala Power Plant—inspected 4/30/2009); these inspections are entered into ICIS
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0		
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0 / 0	0	0	0	0 / 0	0	0	0		
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA		

P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	0 / 0	0	0	0	0 / 0	0	0	0		
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	American Samoa Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	American Samoa Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P07C0C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined		26.3%	0 / 0	0	0	0	0 / 0	0	0	0		
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	50%	2	4	2	50%	2	4	2		
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA		
P08A2C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		22.4%	0%	0	4	4	0%	0	4	4		
P10A0C	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.5%	0%	0	4	4	0%	0	4	4		

Guam FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			4	NA	NA	NA	4	NA	NA	NA	6	Correct major universe is 6; data set does not include the following 2 permits: GU0000027 (Pruvient Energy Tanguisson Plant) and GU0020303 (MDI Guam Manenggon Hills Resort); each is entered into ICIS
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			12	NA	NA	NA	10	NA	NA	NA	13	Correct minor universe is 13; the 3 missing from OTIS drilldown are GU0020281 (Continental Air), GU0020290 (Guam Int. Airport), and GU0020362 (Guam Shipyard); each is entered in ICIS

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA	2	R9 has 2 general permits (1 stormwater industrial , 1 stormwater construction permit. There are 43 dischargers under the stormwater construction permit & 2 dischargers under the stormwater Industrial. The 2 general permits are entered & tracked in ICIS. Region 9 tracks the universe of individual filers with EPA's eNOI system rather than ICIS, as allowed in this metric's description.

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01B1C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	4	4	0	100%	4	4	0	5/6 = 83.3%	Correct major universe is 6; 5 have been coded correctly; 1 is not coded correctly because it was in the process of being terminated (termination date 10/26/09--GU0020303 MDI Guam

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
C01B2C	Major individual permits: DMR entry rate based on MRs expected (Forms/Forms) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	11	11	0	100%	11	11	0	17/17=100%	Correct major universe is 6 permits with 17 DMRs—the dataset is not including GU0000027 (Pruvient Energy Tanguisson Plant—6 DMRs all entered into ICIS). [Note: GU0020303 (MDI Guam Manenggon Hills Resort did not require DMR submittals, so not included in the 17]

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	4	4	0	100%	4	4	0	5/6 = 83.3%	Correct major universe is 6 permits with 5 DMRs—the dataset is not including GU0000027 (Pruvient Energy Tanguisson Plant—DMRs all entered into ICIS). [Note: GU0020303 (MDI Guam Manenggon Hills Resort did not require DMR submittals, so not included here)]
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0%	0	4	4	0%	0	4	4		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	8	8	0	100%	8	8	0	9/9 = 100%	Non-major individual permits with correctly coded limits is 9; dataset does not include GU0020362 (Guam Shipyard)

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			45.5%	5	11	6	45.5%	5	11	6		
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			22.2%	2	9	7	22.2%	2	9	7	3	GU0020373 (Umatac) submitted DMRs for the last half of FY2009 under the current permit (eff. 3/1/2009) —these DMRs are entered into ICIS.
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	12	12	0%	0	10	10		
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0 / 0	0	0	0	0 / 0	0	0	0		

P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		
Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E3E	Informal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		

P01F1 E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
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Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0 / 0	0	0	0	0 / 0	0	0	0		
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	0%	0	4	4	0%	0	4	4		

P05B1 E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			8.3%	1	12	11	0%	0	10	10	2/13 = 15.4%	2 of 13 (15%) non-major individual permits were inspected and entered into ICIS: GU002028 1 Continental Air— 7/2/2009 and GU002036 2 Guam Shipyard but are not showing up in the dataset or OTIS drilldown.
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Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0	13/56 = 23.2%	Universe: 45 filers + 9 non-filers + 1 non-stormwater + 1 filer-lapsed = 56; Inspections: 2 filers + 9 non-filers + 1 non-stormwater + 1 filer-lapsed = 13 (see accompanying spreadsheet); all inspections are in ICIS.
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0 / 0	0	0	0	0 / 0	0	0	0		
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA		
P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	0 / 0	0	0	0	0 / 0	0	0	0		

P07C0 C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined	26.3%	0 / 0	0	0	0	0	0 / 0	0	0	0		
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Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Guam Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production Data	Guam Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen Data	EPA Correction	Discrepancy Explanation
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	100%	4	4	0	100%	4	4	0		
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			4	NA	NA	NA	4	NA	NA	NA		
P08A2C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combined		22.4%	100%	4	4	0	100%	4	4	0		
P10A0C	Major facilities without timely action (1 FY)	Goal	Combined	< 2%	18.5%	100%	4	4	0	100%	4	4	0		

Mariana Islands FY 2009 Clean Water Act State Review Framework Data Metrics

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P01A1C	Active facility universe: NPDES major individual permits (Current)	Data Quality	Combined			2	NA	NA	NA	2	NA	NA	NA		
P01A2C	Active facility universe: NPDES major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA		
P01A3C	Active facility universe: NPDES non-major individual permits (Current)	Data Quality	Combined			2	NA	NA	NA	2	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P01A4C	Active facility universe: NPDES non-major general permits (Current)	Data Quality	Combined			0	NA	NA	NA	0	NA	NA	NA	2	R9 has 2 general permits—1 stormwater Industrial & 1 stormwater construction. There are 7 dischargers filed under stormwater construction & 3 dischargers filed under stormwater Industrial (see accompanying spreadsheet). The 2 general permits are entered & tracked in ICIS. Region 9 tracks the universe of individual filers with EPA's eNOI system rather than ICIS, as allowed in this metric's description.

P01B1 C	Major individual permits: correctly coded limits (Current)	Goal	Combined	≥ 95%	99.9%	100%	1	1	0	100%	1	1	0	2/2=100 %	There are 2 major permits with correctly coded limits in ICIS during 2009: MP0020010 (Sadog) and MP0020028 (Agingan STP)
C01B2 C	Major individual permits: DMR entry rate based on MRs expected (Forms/Form s) (1 Qtr)	Goal	Combined	≥ 95%	94.6%	100%	6	6	0	100%	6	6	0		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
C01B3C	Major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Goal	Combined	≥ 95%	93.3%	100%	2	2	0	100%	2	2	0		
P01B4C	Major individual permits: manual RNC/SNC override rate (1 FY)	Data Quality	Combined			0%	0	2	2	0%	0	2	2		
P01C1C	Non-major individual permits: correctly coded limits (Current)	Informational Only	Combined			100%	1	1	0	100%	1	1	0		(other permit is an MS4)
C01C2C	Non-major individual permits: DMR entry rate based on DMRs expected (Forms/Forms) (1 Qtr)	Informational Only	Combined			100%	3	3	0	100%	3	3	0		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
C01C3C	Non-major individual permits: DMR entry rate based on DMRs expected (Permits/Permits) (1 Qtr)	Informational Only	Combined			50%	1	2	1	50%	1	2	1	1/1 = 100%	Percentage is 100% (1 of 1) because one permit is an MS4 which does not require DMR entry (MPS04000 Island of Saipan MS4)
P01D1C	Violations at non-majors: noncompliance rate (1 FY)	Informational Only	Combined			0%	0	2	2	0%	0	2	2		
C01D2C	Violations at non-majors: noncompliance rate in the annual noncompliance report (ANCR)(1 CY)	Informational Only	Combined			0 / 0	0	0	0	0 / 0	0	0	0		
P01D3C	Violations at non-majors: DMR non-receipt (3 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P01E1E	Informal actions: number of major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E2E	Informal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E3E	Informal actions: number of mom-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01E4E	Informal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F1E	Formal actions: number of major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P01F2E	Formal actions: number of actions at major facilities (1 FY)	Data Quality	EPA			2	NA	NA	NA	2	NA	NA	NA		
P01F3E	Formal actions: number of non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01F4E	Formal actions: number of actions at non-major facilities (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01G1E	Penalties: total number of penalties (1 FY)	Data Quality	EPA			0	NA	NA	NA	0	NA	NA	NA		
P01G2E	Penalties: total penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P01G3E	Penalties: total collected pursuant to civil judicial actions (3 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G4E	Penalties: total collected pursuant to administrative actions (3 FY)	Informational Only	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P01G5E	No activity indicator - total number of penalties (1 FY)	Data Quality	EPA			\$0	NA	NA	NA	\$0	NA	NA	NA		
P02A0E	Actions linked to violations: major facilities (1 FY)	Data Quality	EPA	≥ 80%		0%	0	4	4	0%	0	4	4		
P05A0E	Inspection coverage: NPDES majors (1 FY)	Goal	EPA	100%	5.8%	100%	2	2	0	100%	2	2	0		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P05B1E	Inspection coverage: NPDES non-major individual permits (1 FY)	Goal	EPA			0%	0	1	1	0%	0	1	1		
P05B2E	Inspection coverage: NPDES non-major general permits (1 FY)	Goal	EPA			0 / 0	0	0	0	0 / 0	0	0	0		
P05C0E	Inspection coverage: NPDES other (not 5a or 5b) (1 FY)	Informational Only	EPA			0%	0	1	1	0%	0	1	1		
P07A1C	Single-event violations at majors (1 FY)	Review Indicator	Combined			0	NA	NA	NA	0	NA	NA	NA		
P07A2C	Single-event violations at non-majors (1 FY)	Informational Only	Combined			0	NA	NA	NA	0	NA	NA	NA		

Metric	Metric Description	Metric Type	Agency	National Goal	National Average	Mariana Islands Metric Production Data	Count Production Data	Universe Production Data	Not Counted Production	Mariana Islands Metric Frozen Data	Count Frozen Data	Universe Frozen Data	Not Counted Frozen	EPA Correction	Discrepancy Explanation
P07B0C	Facilities with unresolved compliance schedule violations (at end of FY)	Data Quality	Combined		24.4%	100%	1	1	0	100%	1	1	0		The 3/11/09 judicial order (see P01F1E) supersedes the order this record refers to ((MP0020010 Sadog). The order is not closed in ICIS—R9 will check and correct status in ICIS as necessary
P07C0C	Facilities with unresolved permit schedule violations (at end of FY)	Data Quality	Combined		26.3%	0%	0	1	1	0%	0	1	1		
P07D0C	Percentage major facilities with DMR violations (1 FY)	Data Quality	Combined		52.6%	100%	2	2	0	100%	2	2	0		
P08A1C	Major facilities in SNC (1 FY)	Review Indicator	Combined			2	NA	NA	NA	2	NA	NA	NA		

P08A2 C	SNC rate: percent majors in SNC (1 FY)	Review Indicator	Combin ed		22.4%	100%	2	2	0	100%	2	2	0		
Metric	Metric Descriptio n	Metric Type	Agency	Nation al Goal	Nation al Avera ge	Mariana Islands Metric Producti on Data	Count Producti on Data	Universe Producti on Data	Not Counted Producti on	Marian a Island s Metric Froze n Data	Coun t Froze n Data	Univer se Frozen Data	Not Counte d Frozen	EPA Correcti on	Discrepan cy Explanatio n
P10A0 C	Major facilities without timely action (1 FY)	Goal	Combin ed	< 2%	18.5%	0%	0	2	2	0%	0	2	2		

APPENDIX F: FILE SELECTION

Files to be reviewed are selected according to a standard protocol (available here: http://www.epa-otis.gov/srf/docs/fileselectionprotocol_10.pdf) and using a web-based file selection tool (available here: http://www.epa-otis.gov/cgi-bin/test/srf/srf_fileselection.cgi). The protocol and tool are designed to provide consistency and transparency in the process. Based on the description of the file selection process in section A below, states should be able to recreate the results in the table in section B.

A. File Selection Process

There are 12 NPDES permitted major facilities and 18 non-major individual permit facilities. There are 2 non-major stormwater general permits for the Pacific Islands. EPA reviewed 19 inspection and enforcement files during the on-site file review. Twelve of the selected files are major facilities, and seven of the selected files are non-major facilities. EPA reviewed files from each of the Pacific Islands with 7 American Samoa, 9 Guam, and 3 Mariana Islands files reviewed. EPA used the file selection tool to select files with FY 2009 compliance monitoring, violation, or enforcement action information.

B. File Selection Table

#	Program ID	f_city	F_state	f_zip	Inspections	Violations	SEV	SNC	Informal Actions	Formal Actions	Penalty	Universe	Select
1	AS0000027	PAGO PAGO	AS	96799	1	8	0	0	0	0	0	Major	accepted representative
2	AS0020044	PAGO PAGO	AS	96799	1	0	0	0	0	1	0	Minor	accepted representative
3	AS0020036	PAGO PAGO	AS	96799	1	0	0	0	0	0	0	Minor	accepted representative

#	Program ID	f_city	F_state	f_zip	Inspections	Violations	SEV	SNC	Informal Actions	Formal Actions	Penalty	Universe	Select
4	AS0000019	PAGO PAGO	AS	96799	1	5	0	0	0	0	0	Major	accepted representative
5	AS0020010	PAGO PAGO	AS	96799	1	4	0	0	0	0	0	Major	accepted representative
6	AS0020028	PAGO PAGO	AS	96799	1	3	0	0	0	1	0	Minor	accepted representative
7	AS0020001	PAGO PAGO	AS	96799	1	4	0	0	0	0	0	Major	accepted representative
8	GU0020087	AGANA	GU	96932	0	17	0	2	0	0	0	Major	accepted representative
9	GU0020222	HAGATNA	GU	96928	0	83	0	4	0	0	0	Major	accepted representative
10	GU0110019	APRA HARBOR NAVAL BASE	GU	96932	0	63	0	4	0	0	0	Major	accepted representative
11	GU0020281	TAMUNIN G	GU	96911	1	0	0	0	0	0	0	Minor	accepted representative
12	GU0020362	AGANA	GU		1	0	0	0	0	0	0	Minor	accepted representative
13	GU0020141	DEDEDO	GU	96912	0	27	0	4	0	0	0	Major	accepted representative

#	Program ID	f_city	F_state	f_zip	Inspections	Violations	SEV	SNC	Informal Actions	Formal Actions	Penalty	Universe	Select
14	GUR10A090	APRA HEIGHTS	GU	96921	1	0	0	0	0	0	0	Minor	accepted representative
15	GU0000027	DEDED0	GU	96912	0	10	0	1	0	0	0	Major	accepted representative
16	GU0020273	MERIZO	GU	96916	0	9	0	0	0	0	0	Minor	accepted representative
17	MP0020028	SAIPAN	MP	96950	1	61	0	3	0	2	0	Major	accepted representative
18	MP0020371	SAIPAN	MP	96950	0	2	0	0	0	0	0	Minor	accepted representative
19	MP0020010	SAIPAN	MP	96950	1	18	0	2	0	2	0	Major	accepted representative

APPENDIX G: FILE REVIEW ANALYSIS

This section presents the initial observations of the region regarding program performance against file metrics. Initial findings are developed by the region at the conclusion of the file review process. The initial finding is a statement of fact about the observed performance, and should indicate whether the performance indicates a practice to be highlighted or a potential issue, along with some explanation about the nature of good practice or the potential issue. The File Review Metrics Analysis Form in the report only includes metrics where potential concerns or areas of exemplary performance are identified.

Initial findings indicate the observed results. They are preliminary observations and are used as a basis for further investigation. These findings are developed only after evaluating them against the PDA results where appropriate, and talking to the state. Through this process, initial findings may be confirmed, modified, or determined not to be supported. Findings are presented in Section IV of this report.

The quantitative metrics developed from the file reviews are initial indicators of performance based on available information and are used by the reviewers to identify areas for further investigation. Because of the limited sample size, statistical comparisons among programs or across states cannot be made.

Clean Water Act Program

Name of State: Pacific Islands

Review Period: 2009

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
Metric 2b	American Samoa: Percent of files reviewed where data is accurately reflected in the national data system.	28.6%	Area for Regional Improvement. Two of 7 American Samoa files reviewed contained documentation to confirm that the MDRs were reported accurately into ICIS. Some inspection reports were missing and one file had inaccurate facility owner information.
Metric 2b	Guam: Percent of files reviewed where data is accurately reflected in the national data system.	66.7%	Area for Regional Improvement. Six of 9 Guam files reviewed contained documentation to confirm that the MDRs were reported accurately into ICIS. Three enforcement actions taken at major facilities in FY 2009 were discovered during that file review that are not reported under data metrics 1E2 or 1F2.
Metric 2b	Mariana Islands: Percent of files reviewed where data is accurately reflected in the national data system.	100%	Meets SRF Program Requirements. Three of 3 Mariana Islands files reviewed contained documentation to confirm that the MDRs were reported accurately in ICIS.

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
Metric 6a	Inspection reports reviewed	10	N/A, count metric, no finding level required. EPA reviewed 10 inspection reports during the on-site file review. Three inspection reports were reviewed for American Samoa, 5 inspection reports were reviewed for Guam, and 2 Mariana Islands inspection reports were reviewed.
Metric 6b	American Samoa, Guam, Mariana Islands: Inspection reports reviewed that are complete.	100%	Meets SRF Program Requirements. All inspection reports reviewed are complete and meet the standards of the NPDES Inspection Manual for inspection report content, quality, and completeness. EPA reviewed 3 American Samoa, 5 Guam, and 2 Mariana Islands inspection reports prepared by Region 9, all of which are complete.
Metric 6c	Inspection reports reviewed that provide sufficient documentation to determine compliance at the facility.	100%	Meets SRF Program Requirements. All 10 inspection reports reviewed provide sufficient documentation to determine compliance at Pacific Islands facilities in American Samoa, Guam, and the Mariana Islands.
Metric 6d	American Samoa: Inspection reports completed within the prescribed time frame.	33%	Area for Regional Improvement. One of 3 American Samoa inspection reports reviewed were completed in the prescribed timeframe of 30-45 days. Average inspection report completion time for American Samoa inspection reports is 113 days.
Metric 6d	Guam; Mariana Islands: Inspection reports completed within the prescribed time frame.	0%	Area for Regional Improvement. None of the 8 Guam and Mariana Islands inspection reports are completely within 30-45 days. Zero of 5 inspection reports reviewed were completed in the prescribed timeframe of 30-45 days for Guam inspections. Zero of two Mariana Islands inspection reports were completed in the prescribed timeframe. Average Guam inspection report completion timeframe is 104 days, while average Mariana Islands inspection report completion timeframe is 120 days.
Metric 7e	American Samoa, Guam, Mariana Islands: Inspection reports reviewed that led to a compliance determination.	100%	Meets SRF program requirements. All inspection reports reviewed led to a compliance determination. All 10 inspection reports reviewed led to a compliance determination.

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
Metric 8b	Verify that facilities with an SEV were accurately determined to be SNC or non-SNC.	100%	Meets SRF program requirements. All 10 compliance determinations in files reviewed demonstrate accurate SEV SNC identification. All 3 American Samoa, 5 Guam, and 2 Mariana Islands compliance determinations reviewed accurately identify significant noncompliance.
Metric 8c	Verify that SEVs that are SNC are timely reported.	0%	Area for Regional Improvement. None of the single event violations in significant noncompliance were reported timely for Guam and Mariana Islands facilities. No SEV SNCs are reported for American Samoa. EPA found 4 Guam and 2 Mariana Islands unreported significant noncompliance violations.
Metric 9a	American Samoa; Guam; Mariana Islands: Enforcement responses reviewed.	11	N/A, no initial finding required for count metrics. EPA reviewed 11 enforcement actions during the on-site file review. EPA reviewed 3 American Samoa, 6 Guam, and 2 Mariana Islands enforcement actions.
Metric 9b	Guam; Mariana Islands: Responses that have returned or will return a source in SNC to compliance.	100%	Meets SRF Program Requirements. All enforcement actions reviewed promoted return to compliance for SNC violations. All 4 Guam and both Mariana Islands enforcement actions promoted return to compliance to address SNC violations. No SNC violations are reported for American Samoa.
Metric 9c	Responses that have returned or will return sources with non-SNC violations to compliance.	100%	Meets SRF Program Requirements. All 9 enforcement responses reviewed return or will return sources with non-SNC violations to compliance. Three American Samoa, 4 Guam, 2 Mariana Islands enforcement responses reviewed will return non-significant noncompliance violations to compliance status.

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
10b	American Samoa: Enforcement responses reviewed that address SNC in a timely manner.	N/A	N/A, no initial finding required; no SNC violations, no results to evaluate for this metric.
10b	Guam: Enforcement responses reviewed that address SNC in a timely manner.	40%	Area for Regional Improvement. Two of 5 federal enforcement responses reviewed address SNC violations in a timely manner.
10b	Mariana Islands: Enforcement responses reviewed that address SNC in a timely manner.	100%	Meets SRF Program Requirements. Two of 2 enforcement responses taken in the Mariana Islands by EPA reviewed addressed SNC violations in a timely manner.
10c	American Samoa: Enforcement actions reviewed that address SNC that are appropriate to the violations.	N/A	N/A, no initial finding required; no SNC violations, no results to evaluate for this metric.
10c	Guam: Enforcement actions reviewed that address SNC that are appropriate to the violations.	80%	Area for Regional Improvement. Four of 5 Guam enforcement actions reviewed address SNC appropriately.

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
10c	Mariana Islands: Enforcement actions reviewed that address SNC that are appropriate to the violations.	100%	Meets SRF Program Requirements. Both Mariana Islands enforcement actions reviewed address SNC violations appropriately.
10d	American Samoa: Enforcement responses reviewed that appropriately address non-SNC violations.	50%	Area for Regional Improvement. Three of 6 enforcement responses reviewed appropriately address non-SNC violations.
10d	Guam: Enforcement responses reviewed that appropriately address non-SNC violations.	83.3%	Area for Regional Attention. Five of six enforcement responses taken by EPA in response to non-SNC violations at facilities in Guam appropriately address the violations.
10d	Mariana Islands: Enforcement responses reviewed that appropriately address non-SNC violations.	100%	Meets SRF Program Requirements. Two of two Mariana Islands enforcement actions reviewed address non-SNC violations appropriately
10e	American Samoa: Enforcement responses that address non-SNC violations in a timely manner.	33.3%	Area for Regional Improvement. Two of 6 EPA enforcement responses taken address non-significant noncompliance violations in a timely manner.

CWA Metric #	CWA File Review Metric Description:	Metric Value	Initial Findings
10e	Guam: Enforcement responses that address non-SNC violations in a timely manner.	66.7%	Area for Regional Improvement. Four of 6 EPA enforcement responses addressed non-SNC violations at facilities in Guam in a timely manner.
10e	Mariana Islands: Enforcement responses that address non-SNC violations in a timely manner.	100%	Meets SRF Program Requirements. Two of 2 enforcement responses reviewed taken by EPA in response to non-SNC violations in the Mariana Islands are timely.
11a	American Samoa, Guam, Mariana Islands: Penalty calculations reviewed that consider and include where appropriate gravity and economic benefit.	N/A	N/A, no initial findings required. There were no formal enforcement responses with penalties in the review year.
12a	Document the rationale for differences between the initial proposed penalty amount and final assessed penalty that was collected.	N/A	N/A, no initial findings required. There were no formal enforcement responses with penalties in the review year.
12b	Penalties collected	N/A	N/A, no initial findings required. There were no formal enforcement responses with penalties in the review year.

APPENDIX H: CORRESPONDENCE

[Attach correspondence between EPA and the state including, if received, comments on Draft Report and Final Report.]