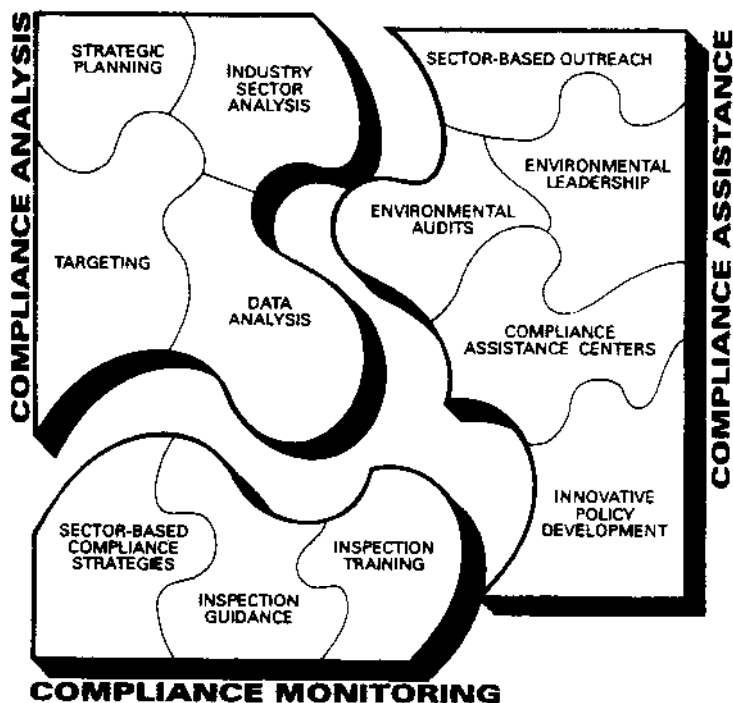


A-8



The Office Of Compliance

An Introductory Guide



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OFFICE OF COMPLIANCE

**Enforcement Planning,
Targeting and Data Division**

**Manufacturing, Energy
and Transportation Division**

**Chemical, Commercial Services
and Municipal Division**

**Agriculture and
Ecosystem Division**

Planning Branch

Manufacturing Branch

Chemical Industry Branch

Agriculture Branch

**Targeting and
Evaluation Branch**

**Energy and
Transportation Branch**

**Commercial Services and
Municipal Branch**

**Laboratory Data
Integrity Branch**

**Data Management
Branch**

**Resource Management
Team**

BACKGROUND

EPA Enforcement: The New Alignment

On June 8, 1994, the Environmental Protection Agency established a new Office of Enforcement and Compliance Assurance (OECA), consolidating a number of functions formerly shared among several different programs at EPA. This brochure introduces the Office of Compliance (OC), one of several offices established within the new organization.

Office of Compliance Mission

The overriding mission of the Office of Compliance is to improve compliance with environmental laws. OC will achieve this by:

- setting national compliance assurance and enforcement priorities through strategic planning and targeting;
- collecting and integrating compliance data;
- developing effective compliance monitoring programs to support inspections and self-reporting;
- building the capacity for more effective compliance assistance to the regulated community;
- improving the quality of regulations;
- working with Regions, States, municipalities, citizens groups and industry; and
- supporting enforcement activity.

Office of Compliance Organization

The Office of Compliance is comprised of four divisions. One Division is responsible for strategic and annual planning to set compliance assurance and enforcement priorities; State/tribal grant guidance; targeting for inspection/enforcement activity; data management; and integration of compliance and enforcement data from EPA program offices. Three Divisions organized by economic sector will develop strategies to identify patterns of noncompliance within the regulated community; support Federal enforcement actions through inspection guidance and better compliance monitoring techniques; and help the regulated community understand and comply with complex federal requirements.

MAJOR OC FUNCTIONS/ACTIVITIES

STRATEGIC PLANNING

- ✓ Develop short and long-term compliance monitoring and enforcement priorities, including State/tribal grant guidance

RISK-BASED TARGETING

- ✓ Focus compliance assurance/enforcement resources on environmentally significant facilities through risk-based targeting
- ✓ Develop targeting approaches that result in high compliance rates, ecosystem protection and environmental justice

DATA INTEGRATION, MANAGEMENT AND ANALYSIS

- ✓ Integrate geographic, corporate, pollutant, media, and industry-specific data to support monitoring and targeting functions
- ✓ Conduct detailed analyses of industry sectors to target compliance and enforcement activities
- ✓ Develop accurate measures of success for enforcement and compliance activities

COMPLIANCE MONITORING

- ✓ Develop inspection and monitoring guidance and training
- ✓ Provide Regional, State and program office support on regulatory matters and rulemakings relating to compliance monitoring

COMPLIANCE ASSISTANCE

- ✓ Focus the presentation and communication of environmental requirements to the regulated community
- ✓ Deliver clear, concise industry-specific technical and regulatory information to States, Regions and the regulated community

ENVIRONMENTAL AUDITING/LEADERSHIP

- ✓ Build partnerships with the regulated community to encourage facilities to go beyond compliance
- ✓ Recognize outstanding compliance records and pollution prevention results

MAJOR OC PROJECT CONTACTS

Common Sense Initiative - Printing Sector

Ginger Gotliffe (202) 564-7072

Ecosystems Management

Walter Brodtman (202) 564-4181

Enhanced Monitoring Rule

Scott Throwe (202) 564-7013

Electronic Data Interchange

Lucy Reed (202) 564-5036

Environmental Auditing

Geoff Garver (202) 564-5017

Environmental Justice

Pat Alberico (202) 564-5017

Environmental Leadership Program

Tai-Ming Chang (202) 564-5081

Expansion of C.A.A. Section 507 Enforcement Response Policy

Elliott Gilberg (202) 564-2310

IDEA Analyses

Bruce Rothrock (202) 564-2375

International GLP Agreements

David Dull (202) 564-7049

Sector Notebooks Project (industry profiles)

Mike Barrette (202) 564-7019

Small Town Compliance Assistance Strategy

Ken Harmon (202) 564-7049

Targeting Network

Rick Duffy (202) 564-2345

Worker Protection Strategy

Phyllis Flaherty (202) 564-2355

PLANNING, TARGETING AND DATA

Strategic Enforcement Planning

The Enforcement Planning, Targeting and Data Division (EPTDD) develops the strategic plan for all compliance assurance and enforcement functions at EPA. The ultimate goal of EPTDD is to focus the Agency's compliance assurance and enforcement resources on noncompliance problems that are pervasive and represent the greatest risk to human health and the environment. To supplement single-media compliance indicators now used for targeting, EPTDD is developing new measures of facility-level compliance with all environmental laws. Compliance data analysis is being used extensively to establish targeting priorities, and measure the success of national and State enforcement programs.

Developing Targeting Priorities

Data integration efforts by the EPTDD will improve the targeting of compliance and enforcement activities at EPA. Compliance profiles will be developed from historical records, pollution release data, corporate compliance rates, and geographic/demographic characteristics. The IDEA (Integrated Data for Enforcement Analysis) system, managed by EPTDD, has the capability to integrate these data elements from other EPA single-media databases. Based upon data analysis results, initiatives will be developed by EPTDD, the Sector Divisions, and other offices within OECA to address concerns arising within industrial sectors, sensitive ecosystems, and environmental justice areas.

Improving Environmental Success Measures

Risk-based measures of enforcement activities and compliance results are being developed by EPTDD to gauge the environmental impact of national and State enforcement programs. As these measures are refined, EPTDD will continue to work with Regional, State and tribal groups to promote effective enforcement strategies and ensure consistency of compliance and inspection data.

DEVELOPING SECTOR STRATEGIES

Using the "Sector" Approach to Improve Compliance

Traditionally at EPA, work has been divided along single-media statutory lines -- air, water, waste and toxic substances. Within the Office of Compliance, all compliance issues related to a specific economic category (or industrial group) are handled by staff units specializing in that particular sector. This multi-media orientation is expected to improve compliance rates in several ways.

Identification and Targeting of Noncompliance Patterns: The Sector Divisions will identify patterns of noncompliance within specific economic sectors, and devise appropriate compliance assurance and enforcement strategies to correct violations. That effort will include publishing periodic compliance profiles for specific industries.

Support for the Enforcement and Compliance Assurance Program: The Sector Divisions will support the enforcement and compliance assurance program through inspection guidance, by improving compliance monitoring, and by providing technical advice where needed to support major enforcement actions. The specific industry expertise in the Office of Compliance will be critical to these functions.

Development of Compliance Assistance Programs: The Sector Divisions will develop programs that help to organize and better explain different environmental requirements that affect the same industry. As a first step, the Office of Compliance is developing "compliance service centers" to help those small business sectors with significant regulatory requirements.

Media Programs

The Sector Divisions are also responsible for those compliance activities (e.g., regulatory development, inspection guidance) that OECA performs for media programs. See page 12 for information on these responsibilities.

OC DIRECTORY

OFFICE OF COMPLIANCE

Elaine Stanley, Director
Eric Schaeffer, Deputy Director

Mail Code - 2221-A
202-564-2280
202-564-2280

ENFORCEMENT PLANNING, TARGETING AND DATA DIVISION (2222-A)

Frederick Stehli, Director 202-564-2290
Pat Alberico, Deputy Director 202-564-2290
Bob Heiss, Senior Legal Advisor 202-564-2290

Planning Branch

Responsibilities: Strategic planning, OECA priority setting, state grant and operating plan coordination, and inter-agency Memoranda of Understanding with other Federal agencies

Jack Neylan, Branch Chief 202-564-2385
Rita Smith, MOA Team 202-564-5044
Phil Milton, Strategic Planning Team 202-564-5029
Karen Milne, RCRA Import/Export Team 202-564-5028

Data Management Branch

Responsibilities: Compliance data system management (e.g., AIRS, NCDB, PCS, RCRIS, SETS, Enforcement Dockets), data integration (IDEA), training and user support

Carol Galloway, Branch Chief 202-564-2375
Bob Zisa, Program Regional Liaison Team 202-564-5048
Chris Nugent, System Support and Analysis Team 202-564-7051
Bruce Rothrock, Integration Team 202-564-5038
Mike Mundell, Systems Operations Team 202-564-5031
Bob Small, Import/Export Team 202-564-5043

Resource Management Team

Responsibilities: Contracts management, budget formulation, financial management, OC administrative activities, and Freedom of Information Act tracking

Roberta Miller, Team Leader 202-260-7691

OC DIRECTORY

ENFORCEMENT TARGETING, PLANNING AND DATA DIVISION (continued)

Targeting and Evaluation Branch

Responsibilities: Risk-based targeting, compliance rate analysis, regional/state program evaluation, success/performance measures, and accomplishment reports

Rick Duffy, Branch Chief 202-564-2345
Joseph Acton, Measures of Success 202-564-5002
Gerald Lappan, Targeting Network 202-564-5024
Daniel Palmer, Regional Reviews 202-564-5034

AGRICULTURE AND ECOSYSTEM DIVISION (2225-A)

Rick Colbert, Director 202-564-2320
David Dull, Associate Director 202-564-2320

Agriculture Branch (AB)

Regulated sectors: Agricultural production (crops/livestock), forestry, fishing, hunting, agricultural chemicals, irrigation systems, farm, lawn supply, pest control, public lands, wildlife and forests

Phyllis Flaherty, Branch Chief 202-564-2355
Walter Brodtman, Ecosystems Team 202-564-4181
David Stangel, Agriculture, FIFRA Issues Team 202-564-4162
Steve Howie, Agriculture, FIFRA Issues Team 202-564-4146

Laboratory Data Integrity Branch (LDIB)

Responsibilities: Implementation of the Laboratory Data Integrity Assurance and Good Laboratory Practice (GLP) programs

Francisca Liem, Chief 202-564-2365
Fred Siegelman, Non-GLP Issues Team 202-564-4159

OC DIRECTORY

MANUFACTURING, ENERGY AND TRANSPORTATION DIVISION (2223-A)
John Rasnic, Director 202-564-2300
Richard Biondi, Associate Director 202-564-2300

Manufacturing Branch (MB)

Regulated sectors: Mining, textile mills, lumber, wood, furniture, paper & allied products, rubber, leather, stone, clay, glass, concrete, primary metals, fabricated metal, electronic equipment, manufacture of transportation equipment and machinery, computers, and woodstoves

Mamie Miller, Branch Chief 202-564-2395
Scott Throwe, Enhanced Monitoring Team 202-564-7013
Greg Waldrip, Metals Team 202-564-7024
Seth Heminway, Wood Products Team 202-564-7017
Robert Marshall, Woodstoves Team 202-564-7021

Energy and Transportation Branch (ETB)

Regulated sectors: Coal mining, oil/gas extraction, petroleum refining, transit, USPS, transportation (air, land, rail, water), pipelines, communications, electric & gas utilities, steam production, petroleum bulk storage & terminals, and auto repair/dealers/services

David Lyons, Branch Chief 202-564-2405
Tom Ripp, Petroleum Refining Team 202-564-7003
Ted Coopwood, Power Generation Team 202-564-7058
Virginia Lathrop, Transportation Team 202-564-7057
Everett Bishop, Auto Services and Repair Team 202-564-7032
Gary Polvi, Inspections and Inspector Training Team 202-564-7056
Joanne Callahan, Radionuclides Team 202-564-5009

OC DIRECTORY

CHEMICAL, COMMERCIAL SERVICES AND MUNICIPAL DIVISION (2224-A)
Susan Bromm, Director 202-564-2310
Elliott Gilberg, Associate Director 202-564-2310

Chemical Industry Branch (CIB)

Regulated sectors: Manufacture and formulation of chemicals and allied products including plastics, synthetic resins, synthetic rubber, pharmaceuticals, detergents, cleaning agents, soaps, cosmetics, paints, varnishes, lacquers, enamels, wood chemicals, dyes, explosives, inks, adhesives, and sealants

Ken Gigliello, Branch Chief 202-564-2524
Emily Chow, Combustion & CFC Compliance Team 202-564-7071

Commercial Services and Municipal Branch (CSMB)

Regulated sectors: Building construction, food products, tobacco, printing and publishing, sewers and wastewater treatment, municipalities, hazardous/solid waste facilities, wholesale trade, building materials, food stores, furniture stores, restaurants, retail, real estate, medical waste, health service, and dry cleaners

Mimi Guernica, Branch Chief 202-564-2415
George Gray, Municipal Issues Team 202-564-7069
Karen Leff, Commercial Services Issues Team 202-564-7068

"To be most effective in measuring compliance and improving targeting of enforcement resources, national enforcement strategies should increasingly be organized around 'sectors' of the economy."

- EPA Administrator Carol Browner

REGULATED SECTOR INDEX

Below is an index of regulated sectors with the appropriate Branch-level contacts. Phone listings appear on the previous pages. Questions pertaining to sectors not listed below should be directed to the Branch handling similar types of industries.

Agricultural - (General - livestock, crops)	AB
Agricultural chemicals - pesticides/fertilizers...	AB
Air transportation	ETB
Amusement/recreation services/sports	CSMB
Auto dealers/service stations/repair	ETB
CFCs	CSMB
Construction	CSMB
Coal mining	ETB
Commercial waste industry (Hazardous and Solid)	CSMB
Communications	ETB
Detergents/cleaning & finishing agents	CIB
Disinfecting and pest control services	AB
Drugs/pharmaceuticals	CIB
Electric power generation	ETB
Electronic/electrical equipment and computers	MB
Explosives, inks, adhesives, sealants	CIB
Farm raw materials	AB
Fishing/hunting/trapping	AB
Food/kinred products and food stores	CSMB
Forestry	AB
Furniture stores	CSMB
Furniture/fixtures (manufacture of)	MB
Health services/hospitals	CSMB
Heavy construction (Buildings...)	CSMB
Industrial inorganic chemicals	CIB
Industrial organic chemicals	CIB
Irrigation systems	AB
Leather and leather products	MB
Lumber and wood	MB

REGULATED SECTOR INDEX

Abbreviations: AB - Agriculture Branch; CIB - Chemical Industry Branch; CSMB - Commercial Services and Municipal Branch; ETB - Energy and Transportation Branch; MB - Manufacturing Branch.

Machinery (manufacture of)	MB
Mass transit	ETB
Metals (Mining/extraction/production/fabrication)	MB
Mining and quarrying (except fuels)	MB
Natural gas transmission	ETB
Oil and gas extraction	ETB
Paints, varnishes, lacquers, enamels	CIB
Paper and allied products	MB
Petroleum refining, distribution and related industries	ETB
Photographic and medical goods	MB
Pipelines	ETB
Plastics, synthetic resin & rubber (production of)	CIB
Plastics & rubber (manufacture of products)	MB
Power production (electric and gas utilities)	ETB
Printing/publishing industry	CSMB
Public lands, wildlife, and forests	AB
Railroads	ETB
Restaurants	CSMB
Retail (stores - all types except below)	CSMB
Retail nurseries, lawn and garden supply	AB
Sanitary services	CSMB
Stone/clay/glass/concrete production	MB
Textiles (mill products - apparel/fabrics)	MB
Tobacco products	CSMB
Transportation equipment (manufacture of vehicles....)	MB
Transportation (air, land, rail, water)	ETB
Water supply/wastewater treatment	CSMB
Wholesale trade	CSMB
Woodstoves	MB

SINGLE-MEDIA COORDINATION

OC will Retain Single-media Functions

The Office of Compliance recognizes that most Federal and State environmental offices are organized by single media. In order to facilitate access to, and promote coordination with, other offices, OC has designated specific Divisions as the point of contact for single-media compliance issues that arise outside the context of a specific industrial sector. Major statutory issue areas are listed below with the appropriate staff coordinators.

MANUFACTURING, ENERGY AND TRANSPORTATION DIVISION			
STATUTE	ISSUE AREA	COORDINATOR	NUMBER
CAA	General	Sally Mitoff	202-564-7012
CAA	Enhanced Monitoring	Scott Throwe	202-564-7013
CWA	Industrial Wastewater	Peter Bahor	202-564-7029
EPCRA	General	Maria Eisemann	202-564-7016
AHERA	Asbestos	Chris Oh	202-564-7004
CHEMICAL, COMMERCIAL SERVICES AND MUNICIPAL DIVISION			
CAA	Stratospheric Ozone	Emily Chow	202-564-7071
CWA	Municipal	George Gray	202-564-7069
SDWA	Public Water	Joe Sarcone	202-564-7049
RCRA	General	Sandi Jones	202-564-7038
TSCA	General	Ann Stephanos	202-564-7043
AGRICULTURE AND ECOSYSTEM DIVISION			
CWA	Non-point Source Water	Lorilyn McKay	202-564-4151
FIFRA	General	Shruti Sanghavi	202-564-4158
SDWA	Underground Injection Control	Rose Lew	202-564-4147
Multiple	Wetlands/Watersheds/Coastal Zones	Lorilyn McKay	202-564-4151

Statute Acronyms: CAA - Clean Air Act; CWA - Clean Water Act; EPCRA - Emergency Planning and Community Right-to-Know Act; SDWA - Safe Drinking Water Act; RCRA - Resource Conservation and Recovery Act; TSCA - Toxic Substances Control Act; FIFRA - Federal Insecticide, Fungicide and Rodenticide Act.

IMPLEMENTING THE NEW FUNCTIONS

Analysis, Targeting and Communication - Our New Focus

OECA will improve the targeting of enforcement actions against the worst violators, while at the same time help to reduce the transaction costs of understanding and complying with statutory and regulatory requirements. The Office of Compliance will help to achieve both of these goals in five ways: **enforcement planning** (priority-setting based on patterns of non-compliance and risk, and coordination of environmental justice and ecosystem protection programs); **targeting and data management** (developing data systems that help target the worst offenders within a particular industry, that measure success based on compliance history and environmental results, and that allow public scrutiny of facility-level environmental records); **compliance guidance** (advancing the Agency's ability to identify and detect violations, while minimizing monitoring costs); **compliance and enforcement strategies** (analyzing compliance patterns for specific industries and designing appropriate compliance or enforcement strategies for problem sectors); and **auditing and compliance assistance** (encouraging companies to develop strong auditing programs to prevent or correct violations, and helping small businesses understand and meet compliance requirements).

"Although we must maintain an imposing enforcement presence as a means of deterring noncompliance, traditional enforcement should be seen as a tool for achieving the broader goal of compliance and not as an end unto itself. Multi-media, whole facility approaches to enforcement represent the future of environmental protection and should be pursued whenever possible."

- Carol Browner

OTHER OECA OFFICES

OFFICE OF ENFORCEMENT AND COMPLIANCE ASSURANCE

Steve Herman, Assistant Administrator 202-260-4134

Scott Fulton, Deputy Assistant Administrator 202-260-4137

Michael Stahl, Deputy Assistant Administrator 202-260-4543

Office of Site Remediation Enforcement (Mail Code - 2271) 202-260-4814

Bruce Diamond, Director

Responsibilities: Superfund and RCRA corrective action enforcement

Office of Regulatory Enforcement (2241) 202-564-2220

Robert Van Heuvelen, Director

Responsibilities: Civil judicial and administrative enforcement of regulatory programs; legislative policy and guidance development

National Enforcement Investigations Center (2211) 303-236-5100

Frank Covington, Director

Responsibilities: Technical and regional support for enforcement inspections and investigations

Office of Criminal Enforcement (2231) 202-260-4539

Earl Devaney, Director

Responsibilities: Criminal enforcement policy and administration

Federal Facilities Enforcement Office (2261) 202-260-9801

Barry Breen, Director

Responsibilities: Enforcement and compliance activities at federal bases

Office of Federal Activities (2251) 202-260-5053

Richard Sanderson, Director

Responsibilities: NEPA compliance, inter-agency liaison, international enforcement and environmental assessment

Administrative and Resource Management Support Staff (2201) 202-260-4543

Sally Seymour, Director

Responsibilities: Administrative support, budget, contracts, grants, and correspondence control

Enforcement Capacity and Outreach Office (2201) 202-260-4140

Gerald Bryan, Director

Responsibilities: Oversight of National Enforcement Training Institute, liaison with outside groups



United States
Environmental Protection Agency
Office of Compliance, (2221A)
Washington, DC 20460

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How Can You Access the Clearinghouse?

The Clearinghouse is located on the World Wide Web at www.epa.gov/clearinghouse



If You Need Help Or Have Questions

If you have any questions on the Clearinghouse, or if you need help entering links, please contact:

Emily Chow

US EPA, Ariel Rios Bldg. (2224A)
1200 Pennsylvania Ave., NW
Washington, DC 20460

Phone: (202) 564-7071

Fax: (202) 564-0009

E-mail: chow.emily@epa.gov

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Agency (2224-A)
Washington DC 20460
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The National Compliance Assistance Clearinghouse



www.epa.gov/clearinghouse

What is the National Compliance Assistance Clearinghouse?

*EPA has just launched a NEW and INNOVATIVE web site, the National Compliance Assistance Clearinghouse. Through a network of web links, the Clearinghouse is a **single repository** of directories to Federal, State, local and other compliance assistance providers, their websites, and the products/services they have developed! It is the **most comprehensive** source of compliance assistance materials available for the compliance assistance community.*

EPA developed the Clearinghouse because you told us you needed quick access to:

- A comprehensive collection of compliance assistance materials
- A list of compliance assistance contacts, and
- A list of compliance assistance tools others are planning to develop

Therefore, we developed the Clearinghouse to address your needs and much more! It is an outstanding tool whether you provide compliance assistance or whether you are an industry looking for help.

What Can The National Compliance Assistance Clearinghouse Do For You?

The Clearinghouse has cutting edge features that can help you do your job more efficiently:

- **Find Information You Need Quickly:**
it allows you to find compliance assistance information by sectors, geographic locations, environmental focus areas and tool types
- **Find Experts to Help You:**
it puts you in touch with experts across the country
- **Promote Your Products/Tools:**
it helps promote the compliance assistance tools developed by your office
- **Tell EPA What Tools You Need:**
it lets you tell EPA what compliance assistance tools you need to do your job
- **Promote Collaboration:**
it puts you in touch with assistance providers who are working on the same industry sectors or developing compatible products
- **Exchange Information on Successful Practices:**
it helps you keep up-to-date on the latest information and technologies through the communication forum

How Can You Participate?

*The more compliance assistance providers use the site, the more valuable the Clearinghouse will become. What is great about this site is that it will **boost the visibility** of your program and draw users to your web site. Through its links, the Clearinghouse also will help **expand the compliance assistance network** so you can do your job more efficiently.*

Get involved in the network now by:

- Providing links to the information on your web site by simply clicking the "Add-a-Link" button in the Clearinghouse
- Commenting on the links the Clearinghouse provides in addition to rating how useful these links are
- Telling EPA what compliance assistance tools you need to do your job
- Sharing with other users the compliance assistance tools you plan to develop in the near future
- Telling your colleagues about the Clearinghouse

