



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Compliance Assistance Conclusion Data Sheet
for On-site Compliance Assistance Visits
June 2005

EPA staff should use this form to record information during or immediately after a Compliance Assistance (CA) on-site visit. To ensure data quality in ICIS, there needs to be written documentation supporting the data that is entered. This form is not to be used when conducting an inspection and compliance assistance is ancillary to compliance monitoring; the ICDS form should be used for that purpose. The information recorded on this form should be entered into ICIS within two weeks of when the visit occurred, along with the other information required in ICIS. In addition, the completed form should be submitted to your Regional CA Coordinator during the same quarter of the on-site visit.

Information requested on this form that are also mandatory ICIS fields are marked with an asterisk (*). In addition, there are mandatory fields in ICIS that do not appear on this form. Population of a mandatory field in ICIS is required to maintain the integrity and usefulness of the data. Data entered on the ICIS screen cannot be saved without data entered into all of the mandatory fields.

EPA Provider Contact Information

*First Name:
*Last Name:
*Region:
*Phone Number:
*Office:
*E-mail

Activity Information

*Compliance Assistance Activity Title: Onsite Visit or Re-visit/ Focus Area - e.g., marina initiative; drinking water; tribal priority, etc.

Additional Purpose of Activity (check only if applicable):

- Audit
Conduct baseline / data collection
Economically Significant Regulations
Environmental Management Review (Fed Facilities)
Environmental Management Systems Review
P2 assessment activity
Part of an Integrated strategy
Pilot activity/Project/tool
SBREFA Regulations
Small Business Compliance Policy Initiative
Training other providers
Voluntary program (Specify)

*Project/Initiative description:

*Federal Statute(s) and *Section(s) addressed: (check all that apply and write section(s) after statute)

- CAA
CERLCA
CWA
Executive Order
EPCRA
FIFRA
MCRBMA
MPRSA
RCRA
SDWA (PWS or UIC)
TSCA
PPA
Other

*Sectors Addressed

NAICS Code(s):

***EPA Priority – Identify at least one:**

- National OECA MOA Priorities: (e.g., Tribal, CAFOs) _____
- OECA Core Program: yes
- Media Program Office Priorities: (e.g. OW, OPPTS) _____
- Regional Priorities (specify): _____

Reporting Information

*Date of Site Visit (mm/dd/yyyy): ____/____/____
(Enter as “actual completion date” in ICIS)

Estimated hours spent on the activity: _____

Facility Information:

Facility Phone Number: _____
 Facility ID: _____
 Facility Name: _____
 Facility Contact: _____

Street Address: _____
 City: _____ State: _____
 Zip Code: _____

*Did you provide assistance to a small entity**? Yes No

Assistance Provided To (On-Site Visit/Regulated Entity only):

- Regulated Entity (i.e., Business)
- Facility located in EJ community**
- Facility on Indian Country**
- Federal Facility
- Local government (>3300 residents)
- Small business** (100 or fewer employees)
- Small local gov. (3,300 or fewer residents)
- State government

Outcome Measurement (GPRA Measures for FY05 - 07)

Measurement: How do you plan to measure the outcomes of the visit?

- Compliance database check
- Data/Report submitted by client
- E-mail survey
- Mail Survey
- On-site revisit
- On-site visit (measurement conducted during this visit)
- Phone survey
- Pre-survey/post-survey

Did the regulated entity **increase its understanding** of environmental requirements as a result of the visit?
Yes No

Did the regulated entity make **improvements in environmental management practices** as a result of the visit?
Yes (check all that apply) No

- Completed a notification or report
- Corrected monitoring deficiencies
- Corrected record keeping deficiencies
- Implemented new/improved management practices/procedures
- Improved pollutant identification (e.g., labeling)
- Reduced pollution
- Requested a permit application or applied for a permit
- Verified compliance with a previously issued enforcement action

If yes, provide specific details of observed behavior changes*** _____

Has the regulated entity **reduced, treated or eliminated pollution** as a result of any action(s) taken?
Yes No Unknown (without follow up)

If yes, provide estimated or actual pollution reduction information*** _____

** *See pages 4-6 for instructions and definitions.*

*** *If you enter information here, also include in the 'Project/Initiative Description' field in ICIS.*

Additional CACDS Information

The following questions are not part of ICIS but represent useful information for the management of the CA program. Headquarters will be managing this information in a local database, and analyzing its potential as future measures for the CA program.

If you are entering your data directly into ICIS, without using this form in its entirety, please complete and submit this portion, at a minimum, along with facility name and ID (above). Submit this form to your CA Coordinator.

- Were any areas for improvement identified?

Yes No

If yes, please list: _____

- Were any areas for improvement communicated with the facility?

Yes No

- Did the facility indicate that it planned to take any actions or reduce pollutants as a result of the on-site visit?

Yes No

Instructions/Definitions for CACDS for On-Site Compliance Assistance Visits:

The CACDS should be filled out as completely as possible and the related data entered into ICIS within two weeks of completing the on-site visit. The information captured by this form is critical to determining the effectiveness of providing compliance assistance. This form is **not** to be used when conducting an inspection and compliance assistance is ancillary to compliance monitoring; the ICDS form should be used for that purpose.

Activity Information

Additional Purpose of Activity

Voluntary Program is defined as: an EPA, State or EPA/State program that uses innovative approaches to improve environmental performance and, at a minimum, gets regulated entities into compliance, beyond compliance and/or improves environmental management practices. This includes, for example, EMS programs, Performance Track, P2 assessments, etc.

Statute(s) and Section(s) addressed:

This section should be filled out as completely as possible including statute and section of statute. For example, petroleum refineries may be subject to a number of NSPS, NESHAP and MACT air regulations. The information should be recorded as a check mark in the CAA box and "Section 111" entered on the line. A section is required for all statutes selected, if you are unsure please write 'unsure' in the space provided; if CA covers all sections please write "all" in the space provided.

EPA Priority

One of these priority selections must be made. For OECA National Priority and Regional Priority please write in the appropriate priority (if applicable). For Media Program Priority please enter the appropriate media office (if applicable).

Reporting Information

Hours Spent on Activity: Estimate the hours spent in preparation for the on-site visit, travel for the visit, the visit itself and any follow up activities directly related to the visit. If the on-site visit is part of a series of visits/inspections, try to apportion the hours spent accordingly.

Assistance Provided to

Regulated Entity (Business): Profit or nonprofit enterprise or organization employing over 100 individuals (across all facilities and operations owned by the business) and regulated by the statutes for which compliance assistance was provided.

EJ community is defined as: a community which experiences a disproportionate amount of negative health and/or environmental hazards due to race, color, national origin, or income level of the residents.

Indian Country is that part of the United States set aside for federally-recognized Indian tribes. A formal definition is found at 18 U.S.C. §1151. For assistance, contact your Regional Tribal Enforcement Coordinator and Regional Indian Coordinator.

Small business: a small business or entity that employs 100 or fewer individuals (across all facilities and operations owned by the business). The number of employees should be calculated using full time equivalents (2000 hours per year of employment).

Small Community is defined as: communities generally comprised of 3,300 or fewer residents that are: non-profit; governing entities (incorporated or unincorporated) and; that own facilities that supply municipal services).

Outcome Measurement

Outcomes are separated into (1) changes in understanding, (2) improvement in environmental management practices (i.e., behavioral changes) and (3) pollutant reductions. These align with EPA’s Strategic Plan Goal 5 sub-objective measures for compliance assistance (see chart below).

There are a number of ways outcomes can be determined. Outcomes may be identified at the time of the visit, or through a follow up activity. For example, changes in understanding and behavioral changes can be determined through observation of actions at the time of the facility visit (e.g., facility personnel placing labels on previously unlabeled drums of hazardous waste), or by asking questions to determine whether or not there was an increase in understanding. If commitments are made for future changes they should be recorded in the last section at the end of the form (not in ICIS). An effort should be made to determine whether the planned changes were actually made (e.g., the regulated entity submits an updated EMS addressing identified areas for improvement or EPA performs a facility revisit). We do not expect CA providers to observe pollution reductions during the initial visit. Only observed changes and increases in understanding are expected during the initial visit.

How do you plan to measure the outcomes of the visit? For your initial outcome reporting please select ‘Site Visit.’ This indicates that your measurement outcomes were observed during your initial visit. If you perform subsequent measurement activities you may need a new record if the follow up falls outside of the same fiscal year, however we strongly suggest that follow up activities be completed during the same fiscal year. If you observe an increase in understanding and behavior changes during the initial visit select ‘Site Visit’ and record both outcomes. If you follow up the visit (phone survey, re-visit, etc.) and measure pollution reduction you may select the appropriate follow up measurement type (in addition to ‘Site Visit’) and record the pollution reduction in the original record. If additional follow up is performed please make a note of this in the activity description stating when the follow up occurred, the method, and which outcomes were derived from the follow up activity.

Changes in understanding: Changes in understanding can be determined by specifically asking the facility personnel if their understanding of environmental requirements has improved, through visual observation of behavioral changes, or based upon conversation with facility personnel which indicates that they have increased their understanding of environmental requirements. If the “yes” box has been checked in the behavioral change or pollutant reduction section(s) then the “yes” box should also be checked in this section.

Behavioral changes: Only changes observed during the visit should be recorded during the initial outcome reporting. Future follow up activities can be entered in the same record. It is expected that some subset of assistance efforts will receive follow up to determine if changes have been made since the visit and/or to determine if changes made as a result of the visit are sustained over the long term.

Pollutant reductions: Pollutant reductions are not expected to be observed during the initial visit. Follow up measurement activities (e.g., surveys, revisits or regulated entity self-reporting estimated or measured pollution reductions) will typically be needed to establish pollution reduction outcomes.

EPA Strategic Plan Goal 5 Sub-objective 5.1.1: Compliance Assistance.	FY 2005 Goal	By End of FY2008 Goal
Percentage of regulated entities receiving direct compliance assistance from EPA reporting that they increased their understanding of environmental requirements as a result of EPA assistance.	80%	85%
Percentage of regulated entities receiving direct compliance assistance from EPA reporting that they improved environmental management practices as a result of EPA assistance (includes compliance and BMP changes).	30%	35%
Percentage of regulated entities receiving direct assistance from EPA reporting that they reduced, treated, or eliminated pollution, as a result of EPA assistance.	10%	15%