



EPA-305-X-04-002

# **Polychlorinated Biphenyl Inspection Manual**

August 2004

Office of Compliance  
Office of Enforcement and Compliance Assurance  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW (MC 2224-A)  
Washington, D.C. 20460

<http://www.epa.gov/compliance/resources/publications/monitoring/manuals.html>



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

NOV 25 2003

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

**MEMORANDUM**

**SUBJECT:** Fiscal Year 2004 Inspection Conclusion Data Sheet Reporting Forms

**FROM:** Michael M. Stahl  
Director  
Office of Compliance

A handwritten signature in black ink, appearing to read "Michael M. Stahl", written over the printed name and title.

**TO:** Regional Enforcement Division Directors, Regions 1, 2, 4, 6 and 8  
Regional Media Division Directors, Regions 1-10  
Regional Science and Technology Division Directors, Regions 1-10

**Purpose** The purpose of this memorandum is to provide the forms for fiscal year 2004 Inspection Conclusion Data Sheet (ICDS) data collection/reporting. ICDS reporting will continue to be required for the following inspection/evaluation programs in 2004:

- Clean Air Act (CAA) Stationary Source
- Clean Water Act NPDES, excluding pretreatment inspections
- Good Laboratory Practices (GLP)
- Toxic Substances Control Act (TSCA) lead-based paint
- Clean Air Act Mobile Source

and for the following new programs (number of 2003 inspections in parentheses):

- Resource Conservation and Recovery Act Subtitle C (1643)
- Underground Storage Tanks (1327)
- TSCA core, PCBs and asbestos (1090)
- CAA 112 (r) (632)

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**Reporting** The regions and headquarters programs have two options for reporting the FY 2004 ICDS information:

- **Manual reporting:** Submit summary ICDS information at mid-year (April, 2004) and end-of-year (October, 2004) using the form in Attachment A. First-line supervisors need to review the ICDS forms prior

to compiling the ICDS data for mid-year and end-of-year reporting to verify its completeness and accuracy.

- **Integrated Compliance Information System (ICIS):** Use ICIS to enter the ICDS data. HQ will then pull the ICDS information from ICIS for mid-year and end-of-year reporting.

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**Goal 5** One reason to continue to expand ICDS to new media programs is the new structure of the EPA Strategic Plan. Under Goal 5, Compliance and Environmental Stewardship, the sub-objective for Monitoring and Enforcement includes a strategic target for the outcomes from compliance inspections. The strategic target is listed as “the percentage of regulated entities taking complying actions as a result of compliance monitoring.” The measure for this strategic target is dependent upon data collected from the ICDS.

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**ICDS Forms** **Attachment A includes:**

- Changes to the ICDS manual form;
- Procedures for reporting ICDS information manually; and the
- FY 2004 Inspection Conclusion Data Sheet Manual Reporting Form

**Attachment B includes:**

- FY 2004 Process for Entering ICDS Information into ICIS;
- Step-by-Step Process for Entering ICDS Information Into ICIS; and the
- FY 2004 Inspection Conclusion Data Sheet Form for ICIS Reporting

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**Data Quality** We continue to emphasize it is critically important for regional and HQ first-line supervisors (or designated alternates) to review either the manual ICDS forms prior to compiling the ICDS data, or the ICDS information entered into ICIS to verify its completeness and accuracy.

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If you have questions about this memorandum or the Attachments, please call Ken Gigliello at 202-564-7047. We thank you for your attention to this memorandum.

Attachment A: FY 2004 Inspection Conclusion Data Sheet (ICDS) Manual Reporting Form  
Attachment B: FY 2004 Process for Entering ICDS Information into ICIS

cc: OC and ORE Division Directors  
Enforcement Coordinators, Regions 1-10  
MOA Coordinators, Regions 1-10  
Field Operations Group, Regions 1-10

## ATTACHMENT A

### **FY 2004 Inspection Conclusion Data Sheet Manual Reporting Form**

#### **Changes to the Form in FY 2004:**

The ICDS form has been changed to include the new programs added in FY 2004. Additional changes should make it easier for the regions or HQ program to compile the data for mid-year and end-of-year reporting and minimize reporting errors. EPA inspectors and first-line supervisors (or designated alternates) should find it easier to completely and accurately record the ICDS information. The changes include:

- Added RCRA Subtitle C, UST, TSCA core, PCBs and asbestos, and CAA112 (r) to form;
- Modified the question dealing with observing and communicating deficiencies into two (2) separate questions;
- Modified the two questions on compliance assistance to reflect the national policy of the Role of the EPA Inspector in Providing Compliance Assistance During Inspections; and
- Revised the ICDS instructions.

#### **FY 2004 Reporting Process:**

- After completing the revised attached form, EPA inspectors should forward the form to their first-line supervisor or designated alternate. The first-line supervisor or designated alternate should review the forms for accuracy and completeness.
- The first-line supervisor or designated alternate should compile the results from the individual ICDS forms completed by the inspectors and fill in the numbers on the “ICDS DATA REPORTING FORM FOR FY 2004 MID-YEAR and EOY”
- The completed “ICDS DATA REPORTING FORM FOR FY 2004 MID-YEAR and EOY” should be forwarded to OECA at mid-year (April, 2004) and end-of-year (October, 2004).

**FY 2004 EPA MANUAL INSPECTION CONCLUSION DATA SHEET (ICDS) FORM**  
*Instructions and Definitions for Completing the Information Follow*

1. **Region:** \_\_\_\_\_ **Facility Name/Location:** \_\_\_\_\_

2. **General Facility Permit ID or Media-Specific Permit ID number (e.g. NPDES permit #):**  
 \_\_\_\_\_

3. **SIC (4-digit)**     **OR** **NAICS Code (5-digit):**

4. **Date of Inspection:** \_\_\_\_\_ (mm/dd/yyyy)

5. **Media Type (check one only)**

CAA-Stationary  CWA-NPDES  GLP  TSCA Lead Paint  CAA 112r   
 CAA-Mobile Sources  RCRA  UST  TSCA core, PCBs, asbestos

6. **Deficiencies:** Did you observe deficiencies during inspection?  Yes  No *[N/A is not allowed]*  
 a. *If YES, go to #7*  
 b. *If NO, go to #9*

7. **If YES:** Did you communicate the deficiencies to the facility during the inspection?  Yes  No

8. **Actions Taken:** Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated?  Yes  No *[N/A is not allowed]*  
 a. *If NO, go to #9*  
 b. *If YES, check the action(s) taken, or describe any other actions taken. (Check all that apply)*

**Action(s) taken**

- \_\_\_\_\_ Verified compliance with previously issued enforcement action -part or all conditions
- \_\_\_\_\_ Corrected recordkeeping deficiencies
- \_\_\_\_\_ Corrected monitoring deficiencies
- \_\_\_\_\_ Completed a notification or a report
- \_\_\_\_\_ Requested a permit application
- \_\_\_\_\_ Implemented new or improved management practices or procedures
- \_\_\_\_\_ Improved pollutant identification (e.g., labeling, manifesting, storage, etc.)
- \_\_\_\_\_ Reduced pollution (e.g., use reduction, industrial process change, emissions or discharge change, etc.). *Specify the pollutant(s) reduced only if this action is checked.*

**Water:** Ammonia  BOD  COD  TSS  O/G  TC  DO  Metals  CN

**Air:** NO<sub>x</sub>  SO<sub>2</sub>  PM  VOC  Metals  HAPs  CO

**List other actions observed or other pollutants reduced:** \_\_\_\_\_

9. **Assistance:** Did you provide *general* assistance based on national policy? Yes  No   
 Did you provide *site-specific* assistance based on national policy?  Yes  No  
*Note:* EPA inspectors are **not required** to provide compliance assistance.

**Optional Information:** Describe actions taken or assistance provided to assist the facility.

### **NOTE TO EPA INSPECTORS:**

The main purpose of EPA inspections/evaluations is to determine compliance with environmental regulations and enforcement agreements. Secondary purposes include providing a field presence to create a credible deterrent and providing assistance, when appropriate, to help facilities achieve compliance.

- The ICDS is used to identify observable corrections to deficiencies and compliance assistance activities. ICDS is **NOT** designed to capture all of the observations, findings, and other data contained in the final inspection report. Deficiencies identified as potential violations, and actions to address deficiencies noted on the ICDS must be included in the final EPA inspection report.
- ICDS information will be used to collect accomplishments of EPA's national inspection efforts, develop inspection outcomes for GPRA, and manage national compliance monitoring resources.
- The information will NOT be used to track individual EPA inspectors' performance.
- The ICDS should only be used for EPA-led inspections, not for state oversight inspections.

### **Instructions for each question:**

1. **Region, Facility Name/Location:** Enter the Region, and facility name/location (for unpermitted facilities).
2. **Permit ID#:** Enter either the Facility Registration System (FRS) permit ID or media-specific ID # (e.g., NPDES, CAA, or RCRA permit number).
3. **SIC/NAICS Codes:** Identify the SIC or NAICS code at (<http://www.commerce.gov>), (<http://www.osha.gov/oshstats/sicser.html>), (<http://www.census.gov/epcd/www/naics.html>), by CD-rom (PB98-502024- NTIS (800-553-6847), or OC Inspector Website (<http://intranet.epa.gov/oeca/inspector>))
4. **Date of Inspection:** Enter the beginning date of the inspection (e.g., 04/10/2004)
5. **Media Type:** Check the environmental media program inspection being conducted.
6. **Deficiencies:** Check YES or NO. EPA inspectors should follow the regional policy on when and how to inform facilities of deficiencies. Deficiencies are defined as potential violations. Deficiencies are NOT compliance determinations (further review is needed to determine violations). A list of potential deficiencies is on the ICIS compliance monitoring screen. (<https://caribou.rtpnc.epa.gov/ICIS/>)
7. **Communication:** Check YES or NO. N/A is not allowed.
8. **Actions Taken:** Check YES or NO. If Yes, check only action(s) actually observed/seen, or write in a short description of the action in the "Other" section. These are *not* compliance determinations. Check the box to specify the pollutant: *Ammonia* – NH<sub>3</sub>-N, ammonia nitrogen, ammonia as N, *BOD*-Biochemical Oxygen Demand, *COD*- Chemical Oxygen Demand, *TC*-Total Coliform, *TSS*- Total Suspended Solids, SS, Settleable solids, *O/G*- Oil and Grease, *DO*- Dissolved Oxygen, *NO<sub>x</sub>*- Nitrogen Oxides, *SO<sub>2</sub>*- Sulphur Dioxide, *PM*- Particulate Matter, *VOC*- Volatile Organic Compound, *CN*- Cyanide, *HAPs* – Hazardous Air Pollutants, *CO*- Carbon Monoxide, *Metals*- Hexavalent Chromium, Lead, Mercury, etc. Write in other pollutants if not listed. The Case Conclusion Data Sheet Training Booklet [November, 2000] provides additional information on actions taken. The Training Booklet can be obtained by calling the Office of Compliance(202-564-6004).
9. **Compliance Assistance:** Inspectors are **not required** to provide compliance assistance during inspections. Check YES or NO to the two questions. General compliance assistance involves distributing prepared information on regulatory compliance, P2 or other written materials/websites. Refer to National Policy: Role of the EPA Inspector in Providing Compliance Assistance During Inspections, June, 2003 for more information for examples of site-specific assistance. The policy is available on the EPA website ([www.epa.gov](http://www.epa.gov)), the Inspector Website (<http://intranet.epa.gov/oeca/inspector>), or calling (202-564-2300).

### **Data Collection Process:**

- Inspectors must complete the ICDS *immediately* after the inspection is conducted.
- Inspector should forward completed forms to first-line supervisor/designated alternate within five (5) days after returning from either a single inspection, or a series of inspections.
- The first-line supervisor/designated alternate **must** review the ICDS for completeness and accuracy and compile the ICDS information by media program to report ICDS results using the consolidated manual reporting form. The consolidated manual reporting form will be sent to HQ for **mid-year 2004 & end-of-year 2004 reporting**.

**ICDS DATA MANUAL REPORTING FORM FOR FY 2004 MID-YEAR AND EOY**  
**REPORT BY MEDIA PROGRAM**

**IMPORTANT NOTE:**

This is the only form the region must submit if they are using manual reporting instead of ICIS reporting.  
DO NOT SEND INDIVIDUAL ICDS FORMS TO OECA.

- Total number of on-site inspections/evaluations conducted \_\_\_\_\_
- Number of on-site inspections/evaluations where deficiencies were observed \_\_\_\_\_
- Number of inspections/evaluations where deficiencies were communicated to the facility  
\_\_\_\_\_
- Number of on-site inspections/evaluations where the facility took action to address deficiencies  
noted during the inspection or evaluation \_\_\_\_\_
- Total number of inspections/evaluations where general compliance assistance was provided  
\_\_\_\_\_
- Total number of inspections/evaluations where site-specific compliance assistance was provided  
\_\_\_\_\_
- Total number of SIC/NAICS codes inspections/evaluations \_\_\_\_\_
- List the SIC/NAICS codes and (# of inspections for each SIC/NAICS code):  
**SIC example:** 4513 (10), 3922 (2), 3713 (4), 1209 (6), 4522 (12)  
**NAICS example:** 45123 (18), 21456 (6), 32785 (3), 20575 (7)

## ATTACHMENT B

### FY 2004 Process for Entering ICDS Information into ICIS

If the regions and the HQ inspection/evaluation programs decide to use ICIS to report the ICDS information, they will also need to determine who will be responsible for entering the data into ICIS. There are two options:

1. Require EPA inspectors to enter the data directly into ICIS
2. Require central data processing personnel to enter the data into ICIS

While each approach has advantages and disadvantages, **HQ strongly supports data entry by EPA inspectors.** By enabling and requiring EPA inspectors to be responsible for ICIS data entry, it:

- eliminates the need for completing the ICDS form (inspectors may still want to complete the form)
- makes EPA inspectors more accountable for data quality of inspections, and
- encourages EPA inspectors to utilize the ICIS data system more fully

#### **If EPA inspectors will be responsible for ICIS data entry:**

The EPA inspectors will need to be provided access to ICIS and will need some training from the regional/HQ ICIS coordinator. EPA inspectors will **not** be required to complete the ICDS form since all of the ICDS information should be included in the inspector's notes to complete the ICIS data entry process. EPA inspectors can choose to complete the form in the field directly after the inspections to facilitate ICIS data entry at a later date.

#### **If non-EPA inspectors (regional data entry personnel) will be responsible for ICIS data entry:**

EPA inspectors will have to complete the longer ICDS form to enable the data entry personnel to efficiently enter the ICDS data into ICIS. After completing the longer form, EPA inspectors should forward it to their first-line supervisor or designated alternate. The first-line supervisor or designated alternate should review the forms for accuracy and completeness, and then forward the forms to the central data entry personnel. Inspectors can photocopy the ICDS form for their inspections.



## Step-by-Step Process for Entering ICDS Information Into ICIS

**The data fields below are required for ICDS.** Not all ICIS data fields are required to be entered for ICIS. Regions may decide to enter additional data fields for their own purposes.

- Acquire access to the ICIS data system through the regional or HQ ICIS contact
- Log onto the ICIS system: <https://caribou.rtpnc.epa.gov/ICIS/> with a user ID & password
- Click on "Data Entry"
- Click on "Add Compliance Monitoring"
- Complete the data fields on the ICIS screens. The majority of the data fields have pull down menus to assist in making data entry simple and straightforward.

### **The data fields that need to be completed for ICDS information are:**

1. Compliance Activity Type (Select Compliance Inspection **only**)
2. Compliance Monitoring Activity Name (Type in the name of facility, site, etc.)
3. Compliance Monitoring Type (There is a long list segregated by statute. Click on **only** one compliance monitoring type - e.g., Clean Air Act Full Compliance Evaluation FCE, RCRA Compliance Evaluation Inspection CEI, etc.)
4. Region (Select the appropriate region)
5. Facilities (enter the facility name)
6. Federal Statutes (Select either the CAA, CWA, RCRA, or TSCA)
7. Sections (Select the appropriate statutory section that was inspected)
8. SIC and NAICS code (Select the appropriate SIC or NAICS code inspected)
9. Compliance Monitoring Action Reason (Select on either Agency priority, Citizen compliant, Core program, selected monitoring action, or random evaluation/inspection)
10. Compliance Monitoring Action Type (Select EPA **only**)
11. Select Yes, if you observed deficiencies during the inspection/evaluation.
12. Select Yes, if you communicated the deficiencies to facility during inspection
13. If Yes to question #12, click on Edit Deficiencies and select the deficiencies observed during the inspection/evaluation listed from the pull down menu.
14. Click Yes or No on whether actions were taken by the facility to address deficiencies observed? You **must** select NO if the answer to question #12 was NO.
15. If Yes to question #14, click on Edit Corrective Actions and select the appropriate actions listed on the pull down menu
16. If one of the actions taken was "Reduced Pollution", click on Edit Water Pollutants or Edit Air Pollutants and select the pollutants reduced.
17. Click Yes or No on whether general compliance assistance was provided during the inspection or evaluation
18. Click Yes or No on whether site-specific compliance assistance was provided during the inspection or evaluation
19. The inspector can add comments about the inspection or evaluation in the optional "Summary of Comments".
20. **Hit "Save" and the ICDS information entered is saved in the ICIS system**

**FY 2004 Inspection Conclusion Data Sheet (ICDS) Form for ICIS Reporting**

- \* Data elements required to be completed for the ICIS system
  - \*\* Data elements required for Inspection Conclusion Data Sheet reporting
- Data elements that do not have asterisks are *optional*

***For Data Entry Staff Use Only***

- Date Information is Entered into ICIS (mm/dd/year): \_\_\_\_\_

**EPA Inspector Name:** \_\_\_\_\_

**EPA Inspector Phone # (include entire phone # 404-566-9000):** \_\_\_\_\_

**THIS FORM MIRRORS THE FORMAT OF THE ICIS DATA ELEMENTS**

1. \*Compliance Activity Type: (enter Compliance Inspection only) \_\_\_\_\_

2. \*Compliance Monitoring Activity Name: \_\_\_\_\_

**3. \*Compliance Monitoring Type:** Circle ONLY ONE of the following choices:

- |  |  |
|--|--|
| CLEAN AIR ACT (CAA)                                | CWA Pretreatment Industrial User Sampling Inspection |
| CAA Asbestos Demolition and Renovation             | CWA Reconnaissance Inspection (RI)                   |
| CAA Case Development Inspection                    | CWA Sanitary Sewer Overflow (SSO) inspection         |
| CAA Full Compliance Evaluation (FCE )              | CWA Section 311 SPCC Inspection                      |
| CAA Partial Compliance Evaluation (PCE)            | CWA Section 311 SPCC Plan Review                     |
| CAA Stack Test                                     | CWA Stormwater inspection                            |
| CAA 112 (r)(7) Desk Audit                          | CWA Toxics Sampling inspection                       |
| CAA 112 (r) (7) Inspection (i.e., site visit)      | CWA Section 404 Wetlands                             |
| CAA 112 General Duty Clause inspection             | CWA Sewage Sludge Inspection                         |
| CAA CFR Section 68.220 Desk Audit                  |  |
| CAA CFR Section 68.220 Site Visit                  | <b>EPCRA</b>   |
| CAA CFR Section 608 Stratospheric Ozone inspection | EPCRA 313 Data Quality Inspection                    |
| CAA CFR Section 609 Stratospheric Ozone inspection | EPCRA 313 Non/Late reporter Inspection               |
| CAA Motor vehicle fuels (Section 211)              | EPCRA 304/CERCLA 103 Inspection                      |
| CAA Motor vehicle/engine (Section 203)             | EPCRA 311/312 inspection                             |
| CAA Wood Heater Evaluation                         |  |

**CLEAN WATER ACT (CWA)**

- |  |  |
|--|--|
| CWA Compliance Evaluation Inspection (CEI )          | FIFRA Good Laboratory Practices                  |
| CWA Compliance Biomonitoring Inspection (CBI)        | FIFRA Agricultural Use inspection                |
| CWA Compliance Schedule Evaluation (CSE)             | FIFRA Agriculture Use follow-up inspection       |
| CWA Compliance Sampling Inspection (CSI)             | FIFRA Non-Agriculture Use inspection             |
| CWA Case Development Inspection (CDI)                | FIFRA Non-Agriculture Use follow-up inspection   |
| CWA Combined Sewer Overflow (CSO) inspection         | FIFRA Experimental Use inspection                |
| CWA Concentrated Animal Feeding Operation inspection | FIFRA Producing Establishment inspection         |
| CWA Diagnostic Inspection (DI)                       | FIFRA Marketplace inspection                     |
| CWA Performance Audit Inspection (PAI)               | FIFRA Import inspection                          |
| CWA Pretreatment Audit                               | FIFRA Export inspection                          |
| CWA Pretreatment Compliance Inspection (PCI)         | FIFRA Certified applicator inspection            |
| CWA Pretreatment Industrial User Non-sampling Insp.  | FIFRA Use Restricted Pesticide Dealer inspection |
|  | FIFRA Worker Protection Standards inspection     |

**RCRA Hazardous or UST**

- RCRA or UST Compliance Evaluation Inspection (CEI )
- RCRA or UST Compliance Schedule Evaluation (CSE)
- RCRA or UST Compliance Sampling Inspection (CSI)
- RCRA Comp. Groundwater Monitoring Evaluation(CME)
- RCRA Corrective Action Oversight (CAO)
- RCRA Laboratory Audit Inspection
- RCRA Non-Financial Record Review
- RCRA Operation and Maintenance Inspection (OAM)
- RCRA or UST Case Development Inspection (CDI)
- RCRA or UST Follow-up inspection
- RCRA Illegal operators inspection
- RCRA or UST Focused Compliance Inspection (FCI)
- RCRA or UST Citizen complaint inspection

- TSCA AHERA, SEE conducted
- TSCA Section 6 Asbestos Ban, Federal conducted
- TSCA Section 6 Asbestos Ban, SEE conducted
- TSCA Asbestos MAP, federally conducted
- TSCA Asbestos MAP, SEE conducted
- TSCA Section 6 Asbestos Worker Protection, federally conducted
- TSCA Section 6 Asbestos Worker Protection, SEE conducted
- TSCA Good Laboratory Practices
- TSCA Core (Sections 5 and/or 8)
- TSCA Polychlorinated Biphenyls (PCBs)
- TSCA Section 1018 Lead Paint
- TSCA Section 12/13 Imports/Exports
- TSCA Section 402/404 inspections
- TSCA Section 406 inspections

**SDWA (Public Water Supply & UIC)**

- SDWA Sanitary survey
- SDWA UIC inspection

**OTHER**

- Other Oversight Inspection
- Statistically valid non-compliance rate inspection

**TSCA**

- TSCA AHERA, federally conducted

4. \*Region: \_\_\_\_

5. \*Facilities Name and Location: \_\_\_\_\_

6. Planned Start: \_\_\_\_\_ (mm/dd/yyyy)

7. Planned End: \_\_\_\_\_ (mm/dd/yyyy)

8. \*\*Actual Start: \_\_\_\_\_ (mm/dd/yyyy)

9. \*\*Actual End: \_\_\_\_\_ (mm/dd/yyyy)

10. \*Federal Statutes: *Check only ONE of the following:*

CAA \_\_\_\_ CWA \_\_\_\_ CERCLA \_\_\_\_ EPCRA \_\_\_\_ FIFRA \_\_\_\_ MCBRMA \_\_\_\_  
 RCRA \_\_\_\_ SDWA \_\_\_\_ TSCA \_\_\_\_

11. \*Sections: **Circle or check the statutory section that applies to the inspection or the evaluation**

**Statute                      Statutory Section**

**Clean Air Act (CAA):**

- CAA 110                      State Implementation Plans (SIPs)- National Primary & Secondary Ambient Air Quality Standards
- CAA 111                      Standards of Performance for New Stationary Sources (NSPS)
- CAA 112                      National Emission Standards for Hazardous Air Pollutants (NESHAPS/MACTs)
- CAA 112(r)(1)              Prevention of Accidental Release/General Duty Clause
- CAA 112(r)(7)              Prevention of Accidental Release/Risk Management Plans
- CAA 118                      Control of Pollution from Federal Facilities    Control of Pollution from Federal Facilities
- CAA 129                      Solid Waste Fuel Combustion
- CAA 183(e)(A)              Federal Ozone Measures - Best Available Controls
- CAA 183(e)(B)              Federal Ozone Measures – Consumer or Commercial Products

CAA 183(f)	Federal Ozone Measures – Tank Vessel Standards
CAA 202	Emission Standards for New Motor Vehicles or New Motor Vehicle Engines
CAA 203	Prohibited Acts – Motor Vehicle & Motor Vehicle Engines
CAA 207	Compliance by Vehicles and Engines in Actual Use
CAA 208	Information Collection from Motor Vehicle Manufacturers
CAA 211	Regulation of Fuels for Motor Vehicle and Engines
CAA 213	Emission Standards for Nonroad Engines and Vehicles
CAA 219	Urban Bus Standards and Retrofit Requirements
CAA 608	Stratospheric Ozone– National Recycling & Emission Reduction Program
CAA 609	Stratospheric Ozone – Servicing of Motor Vehicle Air Conditioners
CAA 610	Stratospheric Ozone– Nonessential Products Containing Chlorofluorocarbons
CAA 611	Stratospheric Ozone – Labeling
CAA Part C	Prevention of Significant Deterioration (PSD) of Air Quality
CAA Part D	Requirements for Non Attainment Areas/SIP Provisions
CAA Title IV	Acid Rain
CAA Title V	Operating Permits

### **Clean Water Act (CWA)**

CWA 301/307	Effluent Limitations – NPDES Toxic and Pretreatment Effluent Standards
CWA 301/311	Effluent Limitations – Oil and Hazardous Substance Liability Effluent Limitations
CWA 301/404	Effluent Limitations –Permits for Dredged or Fill Material
CWA 308(a)(B)	Records and Reports; Inspections – Sanitary Sewer Overflows
CWA 308(a)(B)	Records and Reports; Inspections – Combined Sewer Overflows
CWA 308(a)(B)	Records and Reports; Inspections – Stormwater
CWA 308(a)(B)	Records and Reports; Inspections – Concentrated Animal Feeding Operations
CWA 308(a)(B)	Records and Reports; Inspections – Biosolids/Sewage Sludge
CWA 308(a)(B)	Records and Reports; Inspections – Aquaculture
CWA 308(a)(B)	Records and Reports; Inspections – Other Permit Violations, Base Program Limits, Reporting, Schedule
CWA 308(a)(B)	Records and Reports; Inspections – Information Requests

### **Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)**

CERCLA 103(a)	Notification requirements respecting released substances
CERCLA 104(e)	Information gathering and access
CERCLA 106	Abatement actions – Response Actions by Potentially Responsible Parties
CERCLA 107(a)	Liability – Cost Recovery

### **Emergency Planning and Community Right to Know Act (EPCRA)**

EPCRA 302	Substances and Facilities Covered and Notification
EPCRA 303	Comprehensive Emergency Response Plans
EPCRA 304	Emergency Notification Section 313 program
EPCRA 311	Material Safety Data Sheets
EPCRA 312	Emergency and Hazardous Chemical Inventory Forms
EPCRA 313	Toxic Chemical Release Forms (TRI)
EPCRA 325	Enforcement: Civil & Administrative Penalties, & Procedures for Administrative Penalties including subpoenas

### **Mercury Containing Battery Recycling Management Act (MCBRMA)**

MCBRMA 103A	Rechargeable Batteries, Rechargeable Consumer Products, Easy Removability and Labeling
MCBRMA 6	Records, Reports, Access – Battery Recycling

**Resource Conservation and Recovery Act (RCRA) & Underground Storage Tanks (UST)**

RCRA 3002	Standards Applicable to Generators of Hazardous Waste
RCRA 3003	Standards Applicable to Transporter of Hazardous Waste
RCRA 3004	Standards Applicable to Owners/Operators of Hazardous Waste Treatment, Storage & Disposal Facilities
RCRA 3005	Permits for Treatment, Storage or Disposal of Hazardous Waste
RCRA 3010	Notification of Hazardous Waste Activity
RCRA 3013	Monitoring, Analysis, Testing
RCRA 3014	Restrictions on Recycled Oil
RCRA 3017	Export of Hazardous Wastes
RCRA 3020	Interim Control of Hazardous Waste Injection
RCRA 7003	Interim Control of Hazardous Waste Injection
RCRA 9002	Notification of Underground Storage Tanks
RCRA 9003	Release, Detection, Prevention, and Correction Regulations
RCRA 9005	Inspections, Monitoring, Testing and Corrective Action
RCRA 9006	Federal Enforcement: Compliance Orders, Procedure, Contents, Civil Penalties

**Toxic Substances Control Act (TSCA)**

TSCA 4	Testing of Chemical Substances and Mixtures
TSCA 5	Manufacturing and Processing Notices
TSCA 6	Regulation of Hazardous Chemical Substances and Mixtures (includes PCBs and asbestos)
TSCA 7	Imminent Hazards
TSCA 8	Reporting and Retention of Information
TSCA 11	Inspections and Subpoenas
TSCA 12	Exports
TSCA 13	Entry into Customs Territory of the U.S.
TSCA 14	Disclosure of Data
TSCA 15	Prohibited Acts
TSCA 203	EPA Regulations -- Asbestos in Schools
TSCA 206	Contractor and Laboratory Accreditation
TSCA 208	Emergency Authority

12. **\*\*Citations: Enter the regulatory citation(s) that apply to the inspection conducted**

13. **\* Programs: No entry needed.** This data element is automatically populated by the ICIS data system based on the information provided in items #10 and #11.

14. **\*\*SIC (4-digit) \_\_\_\_\_ or NAICS Code (5-digit): \_\_\_\_\_**

15. **Media Monitored: Check only ONE of the following:**

- Air \_\_\_\_\_
- Animals (only applies to FIFRA) \_\_\_\_\_
- Humans (only applies to FIFRA) \_\_\_\_\_
- Land (includes RCRA waste, FIFRA Pesticides, TSCA Asbestos and PCBs) \_\_\_\_\_
- Plants (only applies to FIFRA) \_\_\_\_\_
- Schools/Housing/Buildings (includes TSCA lead paint and asbestos) \_\_\_\_\_
- Soil (CERCLA and RCRA Corrective Action, TSCA PCBs, UST soil, UIC remedial activities) \_\_\_\_\_
- Water (biosolids and other sludges) \_\_\_\_\_      Water (drinking) \_\_\_\_\_      Water (ground) \_\_\_\_\_
- Water (navigable) \_\_\_\_\_      Water (sediment) \_\_\_\_\_      Water (stormwater) \_\_\_\_\_
- Water (wastewater to or from POTW) \_\_\_\_\_      Water (wetlands) \_\_\_\_\_

16. **\*Compliance Monitoring Action Reason: (Check only one of the following)**  
 Agency Priority \_\_\_\_\_ Citizen Complaint/Tip \_\_\_\_\_ Core Program \_\_\_\_\_  
 Selected Monitoring Action \_\_\_\_\_ Random Evaluation or Inspection \_\_\_\_\_
17. **\*Compliance Monitoring Agency Type:** \_\_\_\_\_ (EPA is only choice)
18. **If State, local or tribal lead, did EPA assist:** Does not apply to ICDS activities. Leave the box blank.
19. **Number of days physically conducting the activity:** \_\_\_\_\_
20. **Number of hours spent physically conducting the activity:** \_\_\_\_\_
21. **Compliance Monitoring Action Outcome: Check *one* (if known at the time of the activity):**  
 Administrative \_\_\_\_\_ Immediately corrected \_\_\_\_\_ Judicial \_\_\_\_\_ No violation \_\_\_\_\_  
 No compliance monitoring (access denied) \_\_\_\_\_ No compliance monitoring (facility shutdown) \_\_\_\_\_  
 Not immediately corrected \_\_\_\_\_ Notice of Determination \_\_\_\_\_ Under review \_\_\_\_\_  
 Withdrawn \_\_\_\_\_
22. **MOA Priorities: (Circle only one that apply from the following)**
- |   |   |
|---|---|
| CAA Air Toxics and NSR/PSD - Coal-Fired Power Plant(SIC 4911) | RCRA - Permit Evaders (RCRPE)               |
| CAA Air Toxics and NSR/PSD - NSR                              | SDWA Microbial - SWTR Violations (SWTR)     |
| CAA Air Toxics and NSR/PSD - PSD                              | SDWA Microbial - TCR Violations (PWTCR)     |
| Petroleum Refining - Benzene Waste (BENZW)                    | Wet Weather - CAFO (AFLOT)                  |
| Petroleum Refining - LDAR (LDAR)                              | Wet Weather - Combined Sewer Overflow (CSO) |
| Petroleum Refining - Refinery Fuel Gas (REFFG)                | Wet Weather - Sanitary Sewer Overflow (SSO) |
| RCRA - Misidentified Wastes (RMISWT)                          | Wet Weather - Stormwater (STORM)            |

23. **Regional Priorities: (Check only one that apply from the following)**
- |  |   |
|--|---|
| Agriculture  | FIFRA Distributor Registrants Comp.with FIFRA Section 3 |
| Consumer Confidence Rule (CCR) under Safe Drinking Water Act | Endangered Ecosystems                                   |
| EPCRA and CAA Section 112(r) Accident History by Facility    | Lead-Based Paint  |
| EPCRA and CAA Section 112(r) Accident History by Sector      | RCRA Permit Evaders                                     |
| EPCRA and CAA Section 112(r) St. Louis Project               | Sensitive Populations                                   |

24. **\*\*Did you observe deficiencies (potential violations) during the on-site inspection?**  Yes  No
- \*\*If you observed deficiencies, did you communicate them to facility during the inspection?**  
 Yes  No

**\*\*If deficiencies were observed select one or more of the following:**

- Potential violation of a compliance schedule in an enforceable order \_\_\_\_\_
- Potential failure to maintain a record or failure to disclose a document \_\_\_\_\_
- Potential failure to maintain/inspect/ repair equipment including meters, sensors, and recording equipment \_\_\_\_\_
- Potential failure to complete or submit a notification, report, certification, or manifest \_\_\_\_\_
- Potential failure to obtain a permit, product approval, or certification \_\_\_\_\_
- Potential failure to follow a required sampling or monitoring procedure or laboratory procedure \_\_\_\_\_
- Potential failure to follow or develop a required management practice or procedure \_\_\_\_\_
- Potential failure to identify and manage a regulated waste or pollutant in any media \_\_\_\_\_
- Potential failure to report regulated events such as spills, accidents, etc. \_\_\_\_\_
- Potential incorrect use of a material (e.g., pesticide, waste, product) or use of improper/unapproved material \_\_\_\_\_
- Potential failure to follow a permit condition(s) \_\_\_\_\_
- Potential excess emission in violation of a regulation \_\_\_\_\_

27. **\*\*Did you observe or see the facility take any actions during the inspection to address the deficiencies communicated to the facility?**     Yes     No

If YES, check only the action(s) actually observed/seen and/or write a short description of the action in the "optional" section. (Check all of the actions that apply)

**Action(s) taken**

- \_\_\_\_\_ Complete(d) a Notification or Report
- \_\_\_\_\_ Correct(ed) Monitoring Deficiencies
- \_\_\_\_\_ Correct(ed) Record Keeping Deficiencies
- \_\_\_\_\_ Implemented New or Improved Management Practices or Procedures
- \_\_\_\_\_ Improved Pollutant Identification (e.g., Labeling, Manifesting, Storage, etc.)
- \_\_\_\_\_ Reduced Pollution (e.g., Use Reduction, Industrial Process Change, Emissions or Discharge Change, etc.)
- \_\_\_\_\_ Request(ed) a Permit Application or Applied for a Permit
- \_\_\_\_\_ Verify (ied) Compliance with Previously Issued Enforcement Action - Part or All Conditions

*The following common air or water pollutant(s) should only be checked if the "Reduced Pollution" action was checked.*

Water: Ammonia  BOD  COD  TSS  O/G  Total Coliform  D.O.  Metals  Cyanide   
 Other \_\_\_\_\_

Air: NOx  SO2  PM  VOC  Metals  HAPs  CO   
 Other \_\_\_\_\_

28. **Did you provide general compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?**     Yes     No
29. **Did you provide site-specific compliance assistance in accordance with the policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections?**     Yes     No  
**Note: This form does not require EPA inspectors to provide compliance assistance.**

**Optional Information: Describe actions taken by the facility or assistance provided to the facility:** \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

## NOTE TO EPA INSPECTORS

The main purpose of EPA inspections/evaluations is to determine compliance with environmental regulations and enforcement agreements. Secondary purposes include providing a field presence to create a credible deterrent and providing assistance, when appropriate, to help facilities achieve compliance.

- The ICDS is designed to identify readily observable corrections to deficiencies and compliance assistance activities. ICDS is NOT designed to capture ALL of the observations, findings, and other data contained in the final inspection report. Deficiencies identified as potential violations, and actions to address deficiencies noted on the ICDS must be included in the final inspection/evaluation report.
- ICDS information will be used to collect accomplishments of EPA's national inspection/evaluation efforts, develop outcomes for GPRA, and manage national compliance monitoring resources.
- The information will NOT be used to track individual EPA inspector's performance.
- The ICDS should only be used for EPA-led inspections or evaluations, not for oversight inspections of the states.

### **Instructions for Each Question:**

1. **Compliance Activity Type:** EPA inspectors should only enter compliance inspection. This choice includes Clean Air Act Full Compliance Evaluations (FCEs) and Partial Compliance Evaluations (PCEs)
2. **Compliance Monitoring Activity Name:** Enter the actual name of the facility inspected/evaluated
3. **Compliance Monitoring Type:** There are a number of choices listed in alphabetical order by statute. Circle the appropriate choice pertaining to the type of inspection or evaluation conducted. Circle only one choice.
4. **Region:** Enter the EPA region or HQ associated with the inspection/evaluation.
5. **Facilities:** Enter the facility name. If the facility is in FRS, it will automatically populate when you enter sufficient information. If the facility is not in FRS, the data entry person will have to create a new facility to link to FRS.
6. **Planned Start Date of Inspection:** Enter the planned start of the inspection/evaluation
7. **Planned End Date of Inspection:** Enter the planned end date of the inspection/evaluation
8. **Actual Start Date of Inspection:** Enter the actual start date of the inspection/evaluation
9. **Actual End Date of Inspection:** Enter the actual end date of the inspection/evaluation
10. **Federal Statutes:** Check only one of the statutes listed that applies to the inspection/evaluation being conducted.
11. **Sections:** Enter the section(s) of law(s) that authorize the compliance inspection/evaluation. **Examples:** Solid Waste Disposal Act Section 302 for RCRA generator inspections, Clean Air Act Section 112 for MACT partial compliance evaluations, and CWA Section 308 for NPDES inspections. NOTE: When selecting a statute from the previous data element, ICIS provides a pull down list of the statutory sections available for that statute.
12. **Citations:** Enter the regulatory citations that were inspected or evaluated during the on-site activity.  
**Examples:** RCRA:40 CFR 262.11 and 40 CFR 265.31  
CAA: 40 CFR 63.1254 and 40 CFR 60.703  
CWA:40 CFR 129.8 and 40 CFR 122.41
13. **Programs:** This data element is automatically generated by ICIS when completing items #10 and #11.
14. **SIC/NAICS Codes:** Identify the code corresponding to the facility. Guidance on how to identify SIC or NAICS codes can be downloaded at (<http://www.doc.gov>), CD-rom (PB98-502024) by calling NTIS (800-553-6847), or Inspector Website (<http://intranet.epa.gov.oeca/oc/metd/inspector>).
15. **Media Monitored:** Check one or more of the fifteen (15) choices listed.
16. **Compliance Monitoring Action Reason:** Check only one of the five (5) reasons for performing the inspection/evaluation.



17. **Compliance Monitoring Agency Type:** Write in EPA. This is the only choice that should be entered
18. **If State, local or tribal lead, did EPA assist:** Does not apply to ICDS activities. Leave the box blank.
19. **Number of days physically conducting the activity** Enter the number of days to conduct the inspection/evaluation
20. **Number of hours spent physically conducting the activity:** Enter the number of hours it took to conduct the inspection/evaluation
21. **Compliance Monitoring Action Outcome:** Check *one* of the outcomes associated with the inspection/evaluation (if known at the time of the inspection or evaluation)
22. **MOA Priorities:** These are the national priorities. Choose only one that applies to the inspection/evaluation
23. **Regional Priorities:** These are the regional priorities. Choose only one that applies to the inspection or evaluation.
24. **Did you Observe Deficiencies:** Check YES or NO.
25. **Communicating Deficiencies:** If Yes to question #24, did you communicate the deficiencies to the facility? Check YES or NO. EPA inspectors should follow the Regional policy on when and how to inform facilities of deficiencies. Deficiencies are defined as readily observable violations of statues, permits, or regulations. Deficiencies are NOT compliance determinations (further review by a compliance officer or attorney is needed to determine actual violations).
26. **Deficiencies Observed:** Check one or more of the eleven (11) choices.
27. **Actions Taken:** Check YES if you observed the facility taking actions. Check only the action(s) actually observed/seen, or write a short description of the action in the “Optional” section. These are *not* compliance determinations. **If the Reduced Pollution Box is checked, specify the pollutant(s):** *Other -- any pollutant besides listed below. Ammonia – NH<sub>3</sub>-N, ammonia nitrogen, ammonia as N, BOD-Biochemical Oxygen Demand, COD- Chemical Oxygen Demand, TC-Total Coliform, TSS- Total Suspended Solids, SS, Settleable solids, O/G- Oil and Grease, DO- Dissolved Oxygen, NO<sub>x</sub>- Nitrogen Oxides, SO<sub>2</sub>- Sulphur Dioxide, PM- Particulate Matter, VOC- Volatile Organic Compound, CN- Cyanide, HAPs – Hazardous Air Pollutants, CO- Carbon Monoxide, Metals- Hexavalent Chromium, Lead, Mercury, etc.* You can write in other pollutants if not listed. The Case Conclusion Data Sheet Training Booklet [November, 2000] provides additional information on actions taken. The Training Booklet can be obtained by calling the Office of Compliance at 202-564-6004.
28. **General Compliance Assistance:** Check YES if the EPA inspector provided general compliance assistance during the inspection or evaluation. Inspectors are **not** required to provide compliance assistance during inspections. General compliance assistance includes distributing or sharing information on industry regulatory compliance, pollution prevention, or technical written assistance materials or websites and EPA, state and local assistance programs.
29. **Site-Specific Compliance Assistance:** Check YES if the EPA inspector provided site-specific compliance assistance during the inspection or evaluation. Inspectors are **not** required to provide compliance assistance during inspections. Site-specific compliance assistance is defined in the National Policy on the Role of the EPA Inspector in Providing Compliance Assistance During Inspections, dated June 25, 2003.

**Data Collection Process:**

- Inspectors should complete the ICDS form *immediately* after the inspection or evaluation is completed.
- Completed forms should be forwarded to the first-line supervisor or designated alternate within five (5) days after returning from either a single inspection/evaluation or a series of inspections/evaluations.
- The first-line supervisor or designated alternate should review the ICDS for completeness and accuracy.
- The first-line supervisor or designated alternate should then forward the form to the central data entry personnel for entry of the data into ICIS.