

Introduction to State Review Framework Data Metrics Spreadsheet
Clean Air Act
Version 1.0
November 6, 2009

Background on CAA

In 1970, the Clean Air Act ([CAA](#)) required states to develop state implementation plans (SIPs) to control emissions from major and other sources in order to attain and maintain air quality within national ambient air standards. Included in these plans were construction permit programs for new major sources (e.g., New Source Review (NSR) and Prevention of Significant Deterioration (PSD)). States also requested delegation to implement many national performance standards, e.g., New Standards of Performance ([NSPS](#)), National Emission Standards of Hazardous Air pollutants ([NESHAPs](#)) and Maximum Achievable Control Technology ([MACT](#)). In 1990, the CAA was amended to require states and other authorized local agencies to develop Title V Operating Permit programs ([Title V](#)) for major sources and certain minor sources of air toxics emissions.

EPA sets minimum levels of inspection frequency (e.g. compliance evaluations) and enforcement response timeliness and appropriateness via two national guidance or policies (e.g., the [Compliance Monitoring Strategy guidance](#) dated 2001 and the [High Priority Violation policy](#) dated 1998). These policies direct significant resources to states towards major and certain categories of synthetic minor sources. For additional EPA priorities, see:

- EPA's National Priorities Guidance for Compliance and Enforcement:
<http://www.epa.gov/compliance/data/planning/priorities/>.
- CAA Compliance Monitoring Statutory Programs:
<http://www.epa.gov/compliance/monitoring/programs/caa/>
- Specific CAA enforcement priorities can be found at:
<http://www.epa.gov/compliance/civil/caa/caaenfpriority.html>
- EPA's Compliance and Enforcement Assurance Priority: Indian Country Program:
<http://www.epa.gov/compliance/data/planning/priorities/tribal.html>

The permitting programs of the CAA are designed to be primarily implemented (e.g., issuing permits and enforcement) by the states. CAA permitting programs are also implemented by some local agencies and, in the future, Tribal Nations that have developed Tribal Implementation Plans. Currently, all states have approved Title V Operating Permit programs in place and have issued over 15,000 Title V permits, of which more than 14,000 are for major sources and the remainder are for minor permits. Over 17,000 synthetic minor or FESOP permits have also been issued. See OAQPS web site "[TOPS](#)" for detailed state breakouts on permits issued.

Basic Information on the CAA State Review Framework Data Metrics Spreadsheet

The data metrics spreadsheet provides basic information on 1) the definition of the data metric and 2) what aspects of the CAA program the metric is used to evaluate. The spreadsheet also identifies whether the information for a particular data metric is required to be reported to the national data system. Although EPA does not require all data to be reported to the national data system, the regulatory authority is responsible for determining and tracking compliance status and enforcement and maintaining data on compliance status. Data metrics that are required to be reported to the national data system will provide a fairly complete picture of this part of the CAA program. Often, when a data metric is not required to be reported to the national data system, the regulatory authority has more complete data that will be provided to the EPA at the time the state review begins. To obtain more complete data on the metrics that are not required to be reported to the national data system, the state should be contacted directly.

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
1. Data Completeness. Degree to which Minimum Data Requirements are complete.							
1a	"Major" and Title V universe	1a1. AFS operating majors	Region and state should agree on the "current" universe count.	Federally Reportable (FedRep) universe of sources based solely on the source classification and operating status.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
		1a2. AFS operating majors w/ air program code = V for Title V	Region and state should agree on the "current" universe count.	Federally Reportable (FedRep) universe of sources based solely on the source classification and operating status.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1b1	Regulated source or evaluated universe count for SM, NESHAP minor sources or other potentially Federally Reportable (FedRep) minor sources.	1b1. Synthetic minor	Minimum data requirements are listed in the AFS Information Collection Request.	FedRep Synthetic Minor sources currently operating.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1b2		1b2. NESHAP (Part 61) minor	Minimum data requirements are listed in the AFS Information Collection Request.	FedRep NESHAP minor sources currently operating.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1b3		1b3. Active Minor facilities or otherwise FedRep, not including NESHAP Part 61, which may have FedRep requirements if negotiated into an alternative CMS plan, formal enforcement action, etc. (*) This metric only applies to a state's performance if state has an alternative CMS plan in effect.	MDR, CMS or otherwise FedRep. State is <u>not responsible</u> for universe "agreement" except for minors negotiated into an alternate CMS plan) with either FCE or PCE commitments or otherwise FedRep per ICR.	FedRep minors, not including NESHAP minors but does include CMS negotiated alternative plan minors. Universe is also intentionally larger than FedRep, e.g., state or EPA PCEs, therefore, see text in Note column. Determine actual state responsibilities or drilldown details before using metric in SRF review .	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Informational-Only

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
1c1	Subprogram and subpart universe is accurate in AFS (NSPS, NESHAP and MACT)	1c1. NSPS (Part 60) Air program designation per CAA	Minimum data requirements are listed in the AFS Information Collection Request.	Major, SM and other "federally reportable" facilities.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1c2		1c2. NESHAP (Part 61) Air Program designation per CAA	Minimum data requirements are listed in the AFS Information Collection Request.	Major, SM, minor and other "federally reportable" facilities.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1c3		1c3. MACT (Part 63) Air program designation per CAA	Minimum data requirements are listed in the AFS Information Collection Request.	Major, SM and other "federally reportable" facilities.	State/local only (but separate Combined with EPA & Tribal also provided)	AFS	Data Quality
1c4	(continued Metric 1c) Subprogram and subpart universe is accurate in AFS (NSPS, NESHAP and MACT)	1c4. Percent (%) facilities with FCEs conducted after 10/1/2005 that have NSPS Subpart designations complete per ICR.	2005 MDR requires states to phase in an accuracy verification of subpart data after FCEs conducted effective 10/1/2005.	All classes	State/local only (but separate Combined % with EPA & Tribal also provided)	AFS	Data Quality
1c5		1c5. Percent (%) facilities with FCEs conducted after 10/1/2005 that have NESHAP Subpart designations complete per ICR.	2005 MDR requires states to phase in an accuracy verification of subpart data after FCEs conducted effective 10/1/2005.	All classes	State/local only (but separate Combined % with EPA & Tribal also provided)	AFS	Data Quality
1c6		1c6. Percent (%) facilities with FCEs conducted after 10/1/2005 that have MACT Subpart designations complete per ICR.	2005 MDR requires states to phase in an accuracy verification of subpart data after FCEs conducted effective 10/1/2005.	All Classes	State/local only (but separate Combined % with EPA & Tribal also provided)	AFS	Data Quality
1d1	Compliance monitoring counts complete	1d1. Sources with FCEs in reporting period	Minimum data requirements are listed in the AFS Information Collection Request.	Operating Major, SM, and NESHAP Minor sources	State-only	AFS	Data Quality
1d2		1d2. Total FCEs completed in reporting period	Minimum data requirements are listed in the AFS Information Collection Request.	All Major, SM, and NESHAP Minor sources	State-only	AFS	Data Quality
1d3		1d3. Number of PCEs reported to AFS in reporting period. (*) This metric only applies to a state's performance if state has an alternative CMS plan in effect.	State PCEs are not required (unless negotiated) but will be included for informational purposes when reported.	All sources	State-only	AFS	Informational-only
1e	Historical non-compliance counts complete	Number of sources that had violations at any point during the reporting period	Minimum data requirements are listed in the AFS Information Collection Request.	all	State/local only (but separate Combined % with EPA & Tribal also provided)	AFS	Data Quality

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
1f1	Informal enforcement counts complete	1f1. Number of informal enforcement actions issued in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1f2		1f2. Number of sources with informal enforcement in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1g1	HPV counts complete	1g1. Number of new HPVs (pathways) in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1g2		1g2 - Number of sources in new HPV in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1h1	HPV Day Zero pathways with complete new MDR data reporting	1h1 - Discovery action/date: Percent (%) and number of DZs created/reported after 10/01/2005 with Discovery action/date. (At HPV DZ pathway level)	Goal (100%) HPV Policy Implementation Applicable ICR/MDR	All HPV (State only) after 10/1/2005	State-only	AFS	Data Quality
1h2		1h2 - Violating Pollutants: Percent (%) and number of DZ Date or DCRE date after 10/01/2005 with Violating Pollutants. (At HPV DZ pathway level)	Goal (100%) HPV Policy Implementation Applicable ICR/MDR	All HPV (State only) after 10/1/2005	State-only	AFS	Data Quality
1h3		1h3 - HPV Violation Type Code(s): Percent (%) and number of DZ Date or DCRE date after 10/01/2005 with HPV Violation Type Code(s). (At HPV DZ pathway level)	Goal (100%) HPV Policy Implementation Applicable ICR/MDR	All HPV (State only) after 10/1/2005	State-only	AFS	Data Quality
1i1	Formal enforcement action counts complete	1i1. Number of formal actions issued in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1i2		1i2. Number of sources with formal actions in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality
1j	Assessed penalties complete	1j. Total dollar amount of assessed penalties in last FY	Minimum data requirements are listed in the AFS Information Collection Request.	all	State-only	AFS	Data Quality

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
1k	Number of major sources missing CMS policy applicability	1k - Identifies "state/local" responsible major sources in AFS that have not been identified with CMS applicability. Without CMS categories and frequencies, these sources are not included in the automatic unknown compliance status generation.	Goal is 0 (e.g., zero) The CMS policy indicates that all major sources be evaluated within a specified timeframe as negotiated with the state and region.	Active majors	State/local only responsibility provided (but separate Combined % with EPA & Tribal also provided)	AFS/ IDEA	Review Indicator
2. Data Accuracy. Degree to which Minimum Data Requirements are accurate (example, correct codes used, dates are correct, etc.).							
2a	Indicator of accurate violation/noncompliance data entry	Compares the sources with HPV violations to the sources with any noncompliance (e.g., violating compliance status) reported. Regions/states should be aware of small state universes and effect on metric.	Data quality review triggered if the number of noncompliant sources is lower than the number of HPV sources, i.e., ratio $\leq 50\%$. (MDRs). If major sources with noncompliance, e.g., Federally Reportable Violations (FRV) are reported less often than majors with HPV violations by more than a factor of 2, this is a strong indicator that FRV violations are not fully reported and tracked in AFS.	Majors	Investigate basing on state-only compliance status data with separate metric for Combined	AFS	Data Quality
2b1	Stack test results (e.g., Pass or Fail)	2b1. Percentage (%) of stack tests conducted and reviewed without pass/fail results code entered to AFS	Goal is 0% (CMS, Applicable ICR/MDR and Nat'l Stack Test Guidance)	All stack tests conducted at Fed-Rep Sources	State-only	AFS	Goal
2b2		2b2. Number of sources with stack test failures at federally-reportable sources	All stack tests required of facilities, including failures, should be reported to AFS for Fed Rep universes. (National Stack Test Guidance)	All stack tests conducted at Fed-Rep Sources	State-only	AFS	Data Quality
3. Timeliness of Data Entry. Degree to which the Minimum Data Requirements are timely.							
3a	HPV determinations that are identified in a timely manner.	Metric calculates the percentage (%) of HPV Day Zero pathways reported to AFS within the 60 day MDR requirement using the actual new AFS data element Date Created.	Goal is 100%. Applicable ICR/MDR requirement (60 days) and HPV Policy for "promptly entered".	All HPV Day Zeros pathways in current FY and plus previous full FY.	State-only	IDEA or AFS	Goal

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
3b1	Timely reporting of Minimum Reporting Requirements (MDRs) for activities/actions	3b1 Percentage (%) of Compliance Monitoring related MDR actions reported in timely (60 day) manner in FY.	Goal is 100%. Applicable MDR/ICR	FedRep per MDRs for compliance monitoring activities - see detailed actions in Selection Criteria column. (e.g., Majors, SM, NESHAP minors, HPV link and other CMS committed facilities).	State-only	AFS	Goal
3b2		3b2 Percentage (%) of Enforcement related MDR actions reported in timely (60 day) manner in FY.	Goal is 100%. Applicable MDR/ICR	FedRep per MDRs for enforcement type activities - see detailed actions in Selection Criteria column. (e.g., Majors, SM, NESHAP minors, HPV link and other CMS committed facilities).	State-only	AFS	Goal
3c	Comparison of frozen data set	Percent change in each of the Element 1 data metrics (other than informational-only unless MDR/CMS) between the frozen data set and the current data metrics results.	The frozen data set represents the data in AFS at a time when most required data entry for the fiscal year would be expected to be complete.	All	State-only (but separate EPA-only or combined counts available when applicable)		Review Indicator
4. Completion of Commitments. Degree to which all enforcement/compliance commitments in relevant agreements (i.e., PPAs, PPGs, categorical grant, CMS plans, authorization agreements, etc.) are met and any products or projects are completed.							
	State agreements (PPA/PPG/SEA, etc.) contain enforcement and compliance commitments that are met.	Review of PPAs, PPGs, SEAs, or other documents that list enforcement and compliance commitments.			State-only		File Review (possible use of custom regional data)
5. Inspection Coverage. Degree to which state completed the universe of planned inspections/compliance evaluations (addressing core requirements and federal, state and regional priorities).							
5a1	FCE Coverage - CMS Majors, Last Completed CMS 2-year cycle.	5a1. Percent of CMS major sources receiving full compliance evaluations (FCE) by the state in most recently completed CMS 2 year cycle	Goal is 100% or negotiated Alternative plan. CMS sources should receive a full compliance evaluation every 2 years. If region and state negotiated less than 100% 2-year coverage use Element 4 regarding Commitments.	CMS Majors *See note in Selection Criteria Explanation.	State-only (but separate combined % also provided with EPA & Tribal)	AFS	Goal
5a2	FCE Coverage - All Majors, Most Recently Completed 2 fiscal years.	5a2. Percent of CAA active major sources receiving full compliance evaluations (FCE) by the state in the last two fiscal years. Data pull uses the current universe.	Goal is 100% or negotiated plan. Active major sources should receive a full compliance evaluation every 2 years. If region and state negotiated less than 100% 2-year coverage, use Element 4 regarding Commitments.	AFS Majors *See note in Selection Criteria Explanation.	State-only (but separate combined % also provided with EPA & Tribal)	AFS	Review Indicator

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
5b1	FCE Coverage - CMS SM-80s, Current CMS Cycle	5b1. Percent of currently active CMS SM-80 sources with full compliance evaluations by the state during the most current 5 year CMS cycle.	Goal is total of 20% per number of FYs completed in 5 yr CMS cycle. Active SM-80 sources should receive a full compliance evaluation during a CMS 5 year cycle. The first 5 year cycle was FFY2002-FFY2006. The current CMS 5 year cycle is FFY2007-FFY2011. If region and state negotiated less coverage use Element 4 regarding Commitments.	CMS SM-80% ^s *See note in Selection Criteria Explanation.	State-only (but separate combined % also provided with EPA & Tribal)	AFS	Review Indicator
5b2	FCE Coverage - CMS SM80s, last 5 fiscal years	5b2. Informational measure provides data for all SM80% based on a running last 5 FY basis. Compliments metric 5b1 which measures on the current CMS 5-year cycle which is a full cycle only once in every 5 Fees.	FCEs at SM80 facilities are required to be reported per MDR and CMS Guidance.	CMS SM80% *See note in Selection Criteria Explanation.	State-only, (but separate combined % would also be provided)	AFS	Informational-only
5c	FCE/PCE Coverage - All SMs, last 5 fiscal years. (*)	5c. Informational measure provides data for all synthetic minors. (*) <i>This metric only applies to a state's performance if state has an alternative CMS plan in effect.</i>	FCEs at federally reportable sources are required to be reported. PCEs that are part of a negotiated compliance monitoring plan are to be reported pursuant to the Compliance Monitoring Strategy (CMS).	AFS SMs *See note in Selection Criteria Explanation.	State-only (but separate combined % also provided with EPA & Tribal)	AFS	Informational-only
5d	FCE/PCE Coverage - minor sources, last 5 fiscal years. (*)	5d. Informational measure provides data for all minor sources. Does not apply to state review for performance unless state has negotiated minors into their CMS plan. (*) <i>This metric only applies to a state's performance if state has an alternative CMS plan in effect.</i>	Although not all minor source activity or PCEs are required to be reported, this metric provides useful information on the overall health of the compliance monitoring program. Metric may also be useful if state alternative CMS plan has minor sources included or PCE commitments.	AFS minor sources *See note in Selection Criteria Explanation.	State-only	AFS	Informational-only

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
5e	Number of sources with unknown compliance status with respect to CMS requirements	AFS is designed to convert compliance status to unknown based upon the FCE frequency negotiated between the region and state. Frequency is variable, thus this measure may more precisely track whether commitments are completed.	CMS Guidance provides for flexibility in FCE frequency, which is detailed in the state's CMS plan and tracked using AFS.	All majors and SM-80s with CMS (refer to 1k or 1b1 with drilldown details for CMSC)	State-only (but a separate Combined % also provided)	AFS	Review Indicator
5f	Conducted Investigations at CAA stationary sources	Informational measure provides information on this type of activity consistent with CMS.	Required pursuant to the current Air Facility System (AFS) Information Collection Request (ICR). Category of compliance monitoring activity recognized by CMS.	FedRep universe and activities.	State-only	AFS	Informational-only
5g	Review of self-certifications completed	% of self certifications received by state in fiscal year that have been reviewed.	Goal = 100%. CMS recommends all self-certifications to be reviewed.	All active majors with Title V Air Program Code 'active', and cert due, rec'd or reviewed.	State-only	AFS	Goal
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.							
	Percentage of Compliance Monitoring Reports adequately documented in the files.	Evaluation of documentation in the file that is based on the elements in the EPA Compliance Monitoring Strategy.			State-only		Review Indicator
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 (e.g., facility-reported information).							
	Percentage of Compliance Monitoring Reports which identify potential violations in the file within a given time frame established by the Region and state, within 60 days.	Evaluation of documentation in the file that is based on the elements in the EPA Compliance Monitoring Strategy.			State-only		Review Indicator
7c1	Violations reported to national database - AFS.	7c1. % of major/SM/NESHAP minor facilities with noncompliance status vs. universe of major/SM facilities with FCE, stack test or informal/formal enforcement	MDR/ICR and HPV Policy	All Fed Rep (e.g., major/SM/NESHAP minor) facilities with a noncompliance status, FCE, or enforcement actions (informal/formal) any time in FY of review.	State-only (but a separate EPA % also provided)	AFS	Review Indicator

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
7c2		7c2. % of all facilities with a failed stack test and with a noncompliance status vs. total universe of all facilities with stack test failures in reviewed FY.	HPV Policy (pg 2) and National Stack test Guidance (pg 5 and 19), e.g. " . . . all violations of air pollution regulations, whether meeting HPV criteria or not, will be addresses by States, local agencies, or EPA." Review indicator goal is > 1/2 National Average. Supplemental File review recommended for states with less than the national average by more than half.	All facilities with stack test failures in FY of review.	State-only (but a separate EPA % also provided)	AFS	Review Indicator
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.							
8a	High priority violation discovery rate (per source universe - major)	New HPVs identified in fiscal year by the State divided by the number of major sources.	Supplemental File review recommended for regions/states below 1/2 of the national average. (HPV policy)	Majors	State-only (with Regional/Tribal-also provided)	AFS	.
8b	High priority violation discovery rate (per source universe - synthetic minor)	New HPVs identified in fiscal year by the State divided by the number of SM sources.	Supplemental File review recommended for regions/states below 1/2 of the national average. (HPV policy)	SMs	State-only (with Regional/Tribal-also provided)	AFS	Review Indicator
8c	HPV reporting indicator at majors (formal enforcement only)	Metric computes the percent (%) of formal actions taken at major sources during the FY that received a prior HPV listing, and benchmarks it to national average.	Supplemental File review, in addition to SRF random selection, recommended for regions/states less than half of the national average.	Majors with formal actions	State-only	IDEA or AFS	Review Indicator
8d	HPV reporting indicator at majors (informal enforcement actions)	Metric computes the percent (%) of informal actions taken at major sources during the FY that did not receive a prior HPV listing, and benchmarks it to national average.	HPV Policy requires "prompt" designation of violations meeting HPV criteria, therefore, before informal actions issued. Supplemental File review recommended for states with greater the national average by more than half.	Majors with informal actions	State-only	IDEA or AFS	Review Indicator

Clean Air Act Data Metrics Spreadsheet (Public Version 1.0)

Metric #	Name	Description	Guidance, Requirement, or Goal	Universe	EPA and State Data Combined Region/State or State-only Data?	Original Source of Data Provided by EPA	Metric Type
8e	HPV reporting indicator at majors or synthetic minors with failed stack tests	Metric computes the % of facilities with failed stack test actions at major/SM sources during the previous 24 month period that received an HPV listing, and benchmarks it to national average.	Supplemental File review recommended for regions/states less than half of the national average. Stack test failures are one key indicator of HPV Policy criteria.	Majors/SM with failed stack tests	State-only	IDEA or AFS	Review Indicator
9. Enforcement Actions Promote Return to Compliance. Degree to which state enforcement actions include required corrective action (i.e., injunctive relief or other complying actions) that will return the facilities to compliance in a specified time frame.							
	Percentage of formal state enforcement actions that contain a compliance schedule of required actions or activities designed to return the source to compliance. This can be in the form of injunctive relief or other complying actions.	Evaluated based on file reviews protocol using EPA or equivalent state penalty policies for setting injunctive relief.			State-only		Review Indicator
	Percentage of formal or informal enforcement responses that return sources to compliance.	Evaluated based on file review.			State-only		Review Indicator
10. Timely and Appropriate Action. Degree to which a state takes timely and appropriate enforcement actions in accordance with policy relating to specific media.							
10a	Percent (%) of HPV cases which do not meet timely or appropriate goals of the HPV Policy.	% of HPV pathways, state/local only, not meeting HPV Policy goals over a 2 FY period.	HPV Policy oversight	All AFS	State/Local only	AFS	Review Indicator
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 BEN model or other method that produces results consistent with national policy.							
	Percentage of formal enforcement actions that include calculation for gravity and economic benefit consistent with applicable policies.	File review based on file review protocol using national program policy or applicable state penalty policy.			State-only		Goal
12. Final Penalty Assessment and Collections. 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.							
12a	No activity indicator - penalties	No penalties assessed by the state during the fiscal year.	HPV policy	All AFS	State-only	AFS	Review Indicator
12b	Penalties normally included with formal enforcement actions at HPVs	Percent of enforcement actions taken at HPVs that carry any penalty. <i>This metric does not measure appropriateness of penalties, but does flag when additional review is necessary.</i>	Additional review necessary if state is below 80% actions against HPVs with penalty. HPV policy assumes it is an exception that an HPV receives no penalty.	All state actions at sources that were previously HPVs	State-only	AFS	Review Indicator
Notes: (1) State or Local Only metrics exclude Tribal facilities which S/Ls may not have compliance monitoring, enforcement or permitting authority. Metrics exclude facilities which have an AFS LCON code that indicates a "Tribal" flag also applies. (See Regional AFS Managers for guidance) (*) This metric only applies to a state's performance if state has an alternative CMS plan in effect.							

Acronyms and Notes	
AFS	Air Facility System
CAA	Clean Air Act
CMS	Compliance Monitoring Strategy (When the reference is to the National CMS, the reference is to third reference bullet, above.)
DZ	Day Zero
FCE	Full Compliance Evaluation
FY	Fiscal Year (The federal FY is October 1 through September 30)
FRV	Federally-Reportable Violations
HPV	High Priority Violation(s)
ICR	Information Collection Request
MACT	Maximum Achievable Control Technology
MDR	Minimum Data Requirements
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NOV	Notices of Violation
NSPS	New Source Performance Standards
NSR	New Source Review
PCE	Partial Compliance Evaluation
SM	Synthetic Minor
SNC	Significant Noncompliance
SRF	State Review Framework