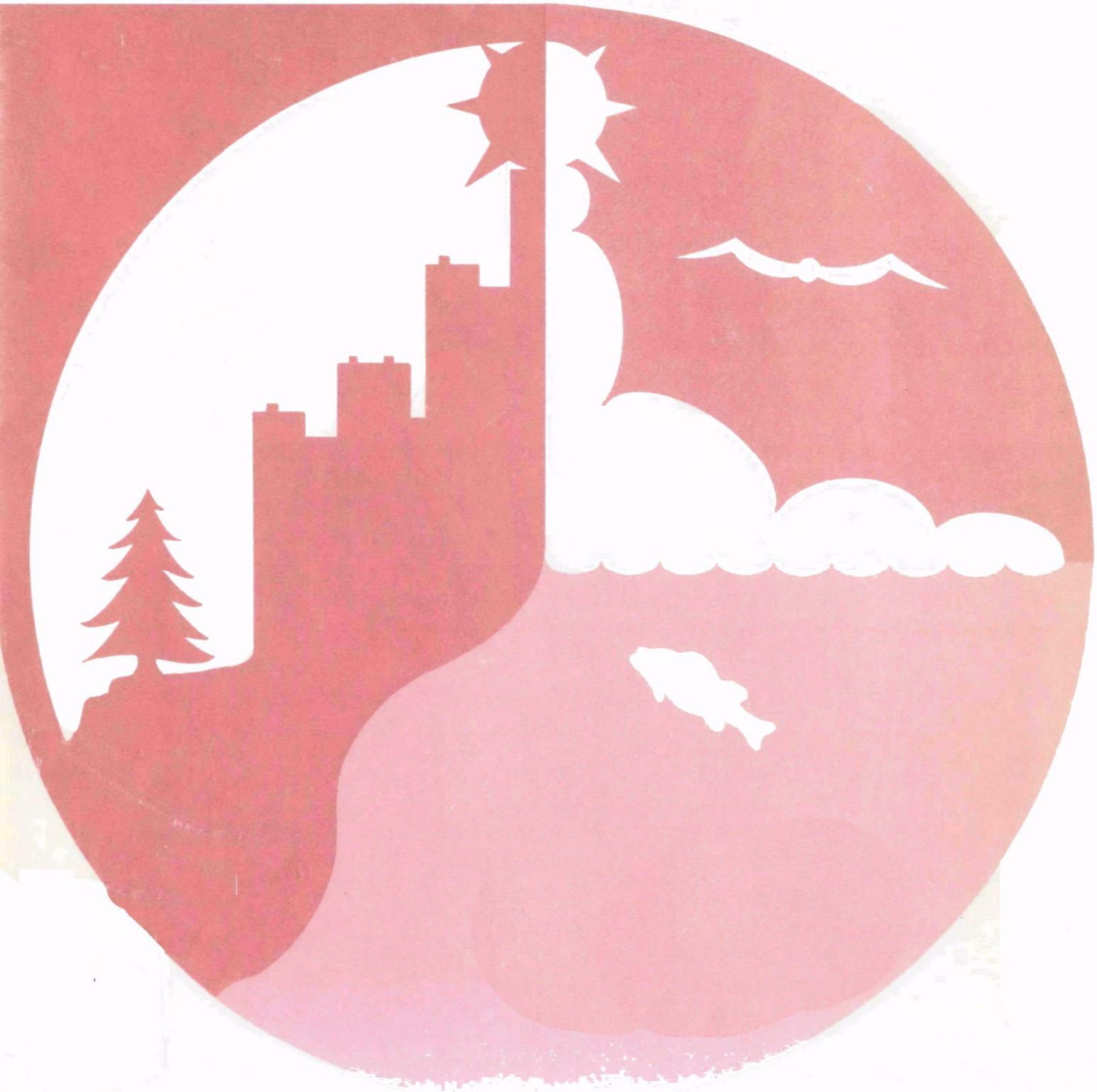
United States
Environmental Protection
Agency

August 1980

EPA

Information Transfer

State/EPA Agreement Tracking Systems



Information Transfer

State/EPA Agreement Tracking Systems

August 1980

CHAPTER I

I.A. INTRODUCTION

The State-EPA Agreements (SEA) are management and communication documents that can be used by the States, Regions and EPA Headquarters to direct attention and resources toward resolution of priority environmental issues. Many environmental problems do not respect arbitrary categories and, hence, cannot be solved in a purely categorical manner. The central aim of the SEA process is to address those environmental problems in a comprehensive way, not limited by sometimes artificial programmatic constraints. The process of developing solutions to particular problems, and then monitoring the progress of those solutions is crucial to SEA effectiveness.

I.B. PURPOSE

The purpose of this study is to examine selected existing regional SEA tracking and evaluation systems, to explain how they work at present, and how they may be refined and improved in the near future. This report is designed to be a vehicle for information exchange among the Regions, and between the Regions and Headquarters, with the aim of encouraging improvements in SEA tracking and evaluation at all levels within the organization. Hopefully, each Region can draw upon the experiences of other Regions to selectively amend its process according to its needs and circumstances.

I.C. METHODOLOGY

The information provided in this report was collected through the use of telephone interviews to managers in all Regions, and through visits to five selected Regions. Regional managers and administrators concerned with the SEA process were interviewed to obtain a detailed view of existing SEA tracking and evaluation systems. The particular emphasis of the interviews was to determine how tracking and evaluation is accomplished as it relates to progress toward product or project completion, problems which arise, resource allocation and adherence to schedules.

I.D. OVERVIEW

Chapter II presents a brief summary of the status and context of Regional tracking and evaluation systems. Chapter III provides the background information on the Regions surveyed by telephone as well as those visited. The information obtained by telephone is general in nature and not meant to be all inclusive. Chapter IV presents a review, analysis, and comparison of the Regional tracking and evaluation systems.

CHAPTER II

II.A. SUMMARY OF FINDINGS

All Regions have developed, and in most cases, implemented an SEA tracking and evaluation system. A summary of the significant features of the systems can be seen in Figure II-1.

Each Region has built its tracking system upon the personal contacts and reporting procedures which were in operation prior to the implementation of the SEAs. Eight Regions have formalized their tracking process and make use of such supporting mechanisms as quarterly reports, summary reports, mid-year reviews, end-of-year evaluations and SEA work plan amendments. It is generally agreed by the Regions that the purpose of an SEA tracking and evaluation system is to provide information for use by managers at various organizational levels, particularly those in the RA's office and on the problem-solving committees of Division Directors. Internal program tracking at EPA and activity progress reporting within the States are the sources of the management information.

The tracking systems are operated by the SEA coordinators with the participation of EPA and State Project Managers, Division Directors, Branch and Section Chiefs and other persons identified as being responsible for an SEA activity. Making the SEA process work requires State and EPA program managers to engage in a joint management process. This has resulted in the identification of mutually agreed upon priorities and commitments to be carried out; and fixes the commitments and responsibilities of both the States and EPA. The SEA tracking and evaluation systems devised by the Regions provide information which does enable senior managers to focus on priority problems and issues.

The tracking systems now in effect vary in the details of how they collect and distribute information, but they all seek to collect basic types of management information with as little additional reporting effort as possible. The most common approach being explored by the Regions is to combine SEA tracking with the current Grants Program reporting. Although efforts in this direction are far from complete, many useful and time-saving practices have been developed to combine the collection and display of information from the two reports.

The types of information collected by the Regions for the purposes of SEA tracking and evaluation deal with: responsibility for a given activity; the timeliness of the completion of an activity; and a short narrative of progress which highlights problems and completed activities. A few Regions are attempting to incorporate the collection and use of manpower and budget information into their tracking and evaluation systems.

The information collected is also evaluated in different ways. Some Regions rely on the SEA Coordinator to synthesize data and pass on problems for resolution within the normal regional management structure. Others have created review or oversight committees specifically designed for SEA evaluation and problem resolution. All Regions incorporate on-site reviews into their process, most concentrating on mid-and end-of-year cycles.

In summary, SEA tracking and evaluation has commenced in the Regions. Some Regions are more advanced than others and have, through experience, developed processes that effectively meet their needs. The remaining Chapters of this study describe and analyze some of these systems. A careful review by interested Regional managers will reveal similarities with their own situations and provide a variety of approaches to developing tracking and evaluation processes which will enhance their managerial capabilities and reduce unnecessary administrative effort.

FIGURE II-1

SUMMARY OF STATE/EPA AGREEMENT TRACKING AND EVALUATION PROGRAMS

REGION CRITERIA	1	2	3	4	5	6	7	8	9	10
TRACKING SYSTEM	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
REPORTING: FORMAL	Quarterly Mid-Year	Mid-Year	Mid-Year	Quarterly	None	Quarterly	Quarterly	Mid-Year	Mid-Year	Quarterly Mid-Year
INFORMAL	Ongoing	Quarterly	Monthly Quarterly	Ongoing	Mid-Year	Quarterly	Ongoing	Quarterly Reports Ongoing Monitoring	Quarterly Mid-Year	Ongoing
ON-SITE VISITS TO STATE	As-Needed	Mid-Year	Mid-Year	Mid-Year	Mid-Year	Quarterly	Quarterly	Mid-year	Mid-Year	Mid-Year and Monthly
EVALUATION MONITORED BY	SEA Co-ordinator	SEA Co-ordinator	SEA Co-ordinator	Sea Co-ordinator	SEA Co-ordinator Would Like to Start Next Year	SEA Co-ordinator Attempting to Track Some Commitments	SEA Co-ordinator 2 Staff	SEA Co-ordinator 1 Staff	SEA Co-ordinator 1 Staff	SEA Co-ordinator 1 Staff
STAGE OF DEVELOPMENT	Operating; Subject to Minor Refinement	Operating; Refinements Continue to Evolve	Operating; Refinements Continue to Evolve	Operating; Refinements Continue to Evolve	Conceptual; Provisional Operation	Operating; Subject to Minor Refinements	Operation Fairly Complete; Improvements Underway	Conceptual; Provisional Operation	Operating	Operating; Refinements Continue to Evolve

CHAPTER III

This Chapter describes the current SEA tracking and evaluation efforts. The first section deals with Regions I, VI, VII, VIII and X, which were visited by the study team. This section discusses the Regions' tracking and evaluation processes, notable characteristics of existing systems, and improvements to the processes that the Regions will try to make during FY 1981. A list of regional staff members interviewed is presented in Appendix A.

The second section presents a summary description of the SEA tracking and evaluation systems in Regions II, III, IV, V and IX, the five Regions which were not visited. This information is very general in nature and far less detailed than in the case of Regions that were visited.

III.A. SECTION I - REGIONS VISITED BY THE STUDY TEAM

III.A.1. REGION I

PROCESS

Region I's State/EPA Agreements identify the chief environmental issues in each State. These issues, usually 12 in number, are identified during the development of the SEA by Division Directors, the SEA coordinator, the DRA and State Officials. Commitments made by the States and EPA to address these issues are tracked by a key senior management group called the Grants Policy Committee. This Committee is made up of the Division Directors, the SEA Coordinator, and is chaired by the Regional Administrator or Deputy Regional Administrator. The SEA tracking and evaluation system is operated by the SEA Coordinator in Region I's Management Division.

The SEA tracking system in Region I is summarized in Figure III-1. It is built around the concept of designating project managers for each issue in the Region and in the States. The joint responsibility for the tracking and managing of SEA priorities increases the level of communication between the States and the Region and creates a greater degree of accountability. Each project manager is charged with the responsibility of facilitating the completion of one or more priority commitments and serving as the manager and spokesman for tasks which related to it, and for seeing that its progress is reported to the SEA Coordinator.

FEATURES

- Region I tracks its priority issues quarterly. The SEA Coordinator sends out a memorandum and reporting form (sample form in Appendix B) to project managers before the end of each quarter.

- Project managers assess the status of their issues and note accomplishments, significant problems and any other items of concern and return the reporting forms to the SEA Coordinator.

FIGURE III-1

REGION I

STATE/EPA AGREEMENT TRACKING PROCESS

MANAGEMENT LEVEL	TRACKING ACTIVITY	
	Quarterly	Semi-Annual
Regional Administrator/ Deputy Regional Administrator	Review and act on SEA issues which are not on track; submit formal letter of concern to states	Same as quarterly
Grants Policy Committee	Review status of major or exceptional unresolved SEA problems; report issues to the RA	Same as quarterly
Division Director	Monitor routine Grants Program activities and attend to pertinent problems noted in SEA tracking report	Same as quarterly
SEA Coordinator	Ensure reporting of progress by project managers; prepare SEA progress reports for Grants Policy Committee	Same as quarterly
Project Managers	Complete quarterly progress report on SEA issues; when significant problems are identified discuss solution with Grants Policy Committee	Same as quarterly

- The SEA Coordinator analyzes the information, and prepares a summary of notable SEA accomplishments and problems which may warrant the attention of the RA and the Grants Policy Committee.

- The Division Directors review the SEA report with regard to their programs, and where possible, recommend actions to resolve difficulties. The Grants Policy Committee and the RA review exceptional unresolved problems and make the decisions necessary to deal with them. In some instances a major problem may require formal contact between the RA and a senior representative of a State agency.

- Division Directors are responsible for dealing with problems noted by the SEA tracking system and also for the monitoring of routine grant activities which are not highlighted by the SEA. This permits the RA to devote his attention primarily to high-priority issues which come to light through the SEA. Grant work plans which include routine activities are not tracked by the SEA process.

DESIRED IMPROVEMENTS

Regional staff members identified several improvements they would like to make for tracking the FY 1981 agreements. These are:

- Reinstitute more detailed mid-year and end-of-year reviews with Senior Management in each State.

- Prepare the FY 1981 SEAs in a format which will facilitate tracking (see Appendix C for a sample of the proposed format).

- Incorporate the tracking of resources (both financial and manpower) into the SEA tracking and evaluation system. This is intended to give the Region the ability to relate projected expenditures of time and money to the level of resources the activity is actually requiring.

III.A.2. REGION VI

PROCESS

SEA tracking and evaluation activities in Region VI are headed by the SEA Coordinator in the RA's office. Other key actors involved in the system are: EPA and State Staff team leaders who are responsible for a specific SEA commitment; Division Directors; and the Deputy Regional Administrator and Regional Administrator. The emphasis is on tracking State SEA priority activities, with EPA commitments addressed primarily through internal management procedures.

Environmental Protection Agency
Library Room 2104
401 M Street, SW, WSM PM-213
Washington, D.C. 20460

The SEA priority tracking system in use in Region VI seeks to provide top management with qualitative management information about SEA progress. This information is collected at the staff level and reported to management. The reporting process isolates for attention only those matters which represent departures from the expected schedule and pattern of events. Thus, top management efforts are focused only on unresolved problems or issues that need their attention. A summary of the tracking and evaluation process for Region VI is presented in Figure III-2.

FEATURES

- Priority issues are identified and staff persons in EPA and State are designated as team leaders for each issue. They are responsible for monitoring and tracking.

- The team leaders formally track progress on a quarterly basis, while informal reporting takes place continuously.

- Semi-annual visits to the States are made by the EPA team leaders and status reports are prepared and submitted to the SEA Coordinator.

- The SEA Coordinator summarizes the material provided to him by the task leaders and notes any exceptional problems. (See summary of SEA status report form in Appendix D.) Highlights of significant accomplishments are also noted at this time. This information is then listed by State on a 1-2 page summary sheet and forwarded to the RA and the Division Directors.

- The Division Directors see that the recommended actions are taken and that problems are resolved. Any anticipated problems which may affect future work progress can also be addressed in these sessions.

- It is anticipated that the RA, DRA, Division Directors, and SEA Coordinator will meet in the future to discuss the problems which are highlighted in the summary sheet and take appropriate action.

- At present, budget and manpower information is not reported in the SEA priority tracking system.

DESIRED IMPROVEMENTS

Region VI will attempt to improve the SEA tracking and evaluation process for FY 1981 by concentrating on three aspects:

- Incorporating budget and manpower estimates into its tracking process.

FIGURE III-2

REGION VI

STATE/EPA AGREEMENT TRACKING PROCESS

MANAGEMENT LEVEL	TRACKING ACTIVITY	
	Quarterly	Semi-Annual
Regional Administrator/ Deputy Regional Administrator	Meet with team leaders on serious problems; meet with Division Directors and SEA Coordinator to review progress and problems, and identify policy actions needed; take necessary actions to resolve problems; interface with senior state management.	Same as quarterly
Division Directors	Review progress and problems with Regional Administrator, Deputy Regional Administrator, and SEA Coordinator and identify actions needed; supervise team leaders in implementation of decisions	Same as quarterly
SEA Coordinator	Attend review meetings, summarize team leader reports and provide them for review meetings	Same as quarterly
Team Leaders	Responsible for reporting progress to SEA Coordinator; formal and informal contact with state counterpart; implement actions determined by senior management	Formal progress and problem review meeting with state counterpart; all quarterly activities

- Developing an integrated, multi-media, multi-year, problem-solving approach to SEA priorities and commitments in FY 1981.

- Developing commitments and activities that are more quantitative and thereby more easily tracked.

III.A.3. REGION VII

PROCESS

Although the SEAs developed in Region VII focus on the SEA priority issues, they include the work plans for all media programs by reference. Region VII defines its priority issues with problem statements, a description of the problem background, goal statements, and commitments to achieve the goals. The commitments are explicitly written to facilitate tracking. A list of these commitments is presented in Appendix K.

The SEA tracking and evaluation system is designed to report progress and problems to senior management. The system is designed to combine reporting of SEA commitments, PPA's and program grant activities into one process. This enhances program coordination and reduces the reporting burden. The system is operated out of the Office of External Affairs by the SEA Coordinator and his staff with the aid of a Policy Review Committee. The Policy Review Committee is chaired by the Regional Administrator and includes the Deputy Regional Administrator, Division Directors, Director of External Affairs and the Regional Counsel. The Branch Chiefs and Section Chiefs are responsible for carrying out EPA commitments. This process is summarized in Figure III-3.

To a very great extent, Region VII has been able to institutionalize the mechanics of an SEA priority commitment tracking system. Reception of the system by the States and the Regional staff has been quite good.

FEATURES

- Before the end of each quarter, reduced photocopies of the SEA commitments (directly from the Agreement) are distributed by SEA staff, to each State in Region VII and each Division within the Regional office for tracking purposes. SEA staff notes the parties responsible for each commitment (see Appendix E). In most instances SEA staff also notes the milestones which were identified in the work plans as being due that quarter.

- The recipients respond on the reporting form with notations regarding progress in meeting SEA commitments and with the information required by the Planned Program Accomplishment (PPA). The recipients also identify and explain any problems encountered or deadlines missed and, in some instances, note any anticipated problems which might cause delays on future commitments. Notable accomplishments during the past quarters are also included on the reporting form.

FIGURE III-3

REGION VII

STATE/EPA AGREEMENT TRACKING PROCESS

MANAGEMENT LEVEL	TRACKING ACTIVITY	
	Quarterly	Semi-Annual
Regional Administrator/ Deputy Regional Administrator	Review exception reports; deputy chair Policy Review Committee; oversee implementation of decisions; contact senior state management as needed	Same as quarterly; attend mid-year and year-end review session with states
Policy Review Committee	Review exception reports and determine actions needed	Same as quarterly
Division Directors	Participate in decision-making; supervise actions necessary to implement decisions	Same as quarterly, attend mid-year and year-end reviews with States
SEA Coordinator	Collect progress reports; prepare exception report; facilitate program interaction and communication with the States	Same as quarterly; attend mid-year and year-end review sessions with states
Branch Chiefs/Section Chiefs	Complete quarterly progress reports; informal regular contact with state counterparts	Same as quarterly

- These reporting forms are completed and returned to SEA staff in accordance with a schedule for tracking sent out to the Region VII States and the EPA Divisions within the Region. This schedule lists the due dates for tracking reports and meetings throughout the year. It is distributed in mid-December of the previous year. (See Appendix F - Schedule of Activities).

- The SEA staff collects the forms from the States and EPA Divisions and prepares an exception report which lists all unfulfilled commitments and notable problems. This report becomes the basis for discussion and action by the Policy Review Committee.

- The Region combines SEA priority commitments, PPA's and Grants on one form and in one report. (See Appendix G). This aids in coordinating reporting functions and reduces the reporting burden.

- The Region has defined and implemented an SEA amendment process. A copy of a letter of amendment is included in Appendix H.

- The next quarter's reporting forms show the progress from the previous quarter. This permits respondent and reviewer to compare progress from quarter to quarter.

- Formal evaluation meetings between EPA and the States are held to discuss unfulfilled commitments only during mid-year and end-of-year review sessions. At other times informal follow-up and discussions of problems and commitments -- both of the States and EPA -- may take place via telephone and on-site visits.

- Any changes to the SEA commitments or work plans must be documented in a letter to the RA which discusses the desired amendment and any foreseeable repercussions it might have on the priority issue.

DESIRED IMPROVEMENTS

During FY 1981 the Region would like to incorporate the following improvements to the SEA tracking and evaluation system:

- Incorporate manpower estimating and tracking into the system.

- Incorporate budget estimating and tracking into the system.

- Investigate ways to further simplify the mechanics of the reporting process.

III.A.4. REGION VIII

PROCESS

Region VIII uses the SEA as a device to identify and manage all State and EPA activities which fulfill priority objectives. Each Division Director is responsible for developing one SEA in the Region. The Resources Management Branch coordinates the SEA process for the Region. For the purpose of tracking and evaluation, the Region focuses its attention on the most important issues which have been identified in the SEA by the Division Directors. All other grant activities are tracked, but problems are usually dealt with more routinely within the programs.

The tracking process currently in use in Region VIII is a two-tiered system designed to provide information to Division Directors and the RA's office. The system, somewhat informal at this time and still in its early stages, provides EPA staff with the opportunity to discuss the fulfillment of SEA commitments with their State counterparts. The system is summarized in Figure III-4.

FEATURES

- The grant work programs are incorporated into the SEAs. The key activities in the work programs are the items which are tracked as priority objectives for the SEA.

- Branch and Section Chiefs under each Division Director are in charge of reporting progress toward meeting SEA commitments on an ongoing basis. (Note: each Division Director in Region VIII is responsible for one SEA.) This is done by both formal and informal means, depending on which staff must enter a narrative of progress for a stated priority commitment. Others use informal meetings, telephone conversations, etc., to keep informed about SEA progress.

- Branch and Section Chiefs, keep the Division Directors informed of any existing or potential problems associated with the fulfillment of priority commitments. Division Directors work with Branch and Section Chiefs to deal with the problems they have highlighted.

- Formal reporting is done quarterly and covers a review and evaluation of EPA commitments, State commitments, and the identification and resolution of problems. In many cases, this involves visits to the States to work out solutions or update work plans.

FIGURE III-4

REGION VIII

STATE/EPA AGREEMENT TRACKING PROCESS

MANAGEMENT LEVEL	TRACKING ACTIVITY	
Tier I	Quarterly	Semi-Annual
Regional Administrator/ Deputy Regional Administrator	General State review at monthly senior staff meetings; make appropriate policy decisions and actions	Indepth review with states at mid-year review meeting
Division Directors	Provide brief status report as necessary at monthly senior staff meeting	Indepth review with states at mid-year review meeting
SEA Coordinator	Prepare RA Tracking Log, provide progress information as required	Assist in preparation of mid-year briefing books
Tier II		
Division Directors	Receive formal and informal reports from Branch and Section Chiefs, take necessary actions to resolve problems	Same as quarterly
Branch Chiefs	Prepare formal or informal reports for Division Directors; carry out necessary actions	Same as quarterly

- The SEA tracking system is used to provide pertinent information to the RA's office on high priority issues and problems through the RA Tracking Log (See Appendix I.) The RA Tracking Log consists of schedules and status information for activities or commitments which EPA staff feel are extremely important and warrant attention of the RA and DRA. Activities other than those related to the SEAs may be included. Specific problems and areas where upper-level attention is needed are noted and the RA's office reviews and suggests a course of action, usually at a monthly senior staff meeting.

- The Division Directors' and RA's comprehensive review of State activities generally takes place at mid-year and end-of-year meetings with the States. The Divisions prepare a status report of accomplishments and problems, based upon the quarterly reviews and RA Tracking Log, which becomes a briefing book for the RA and DRA and serves as the focus for the mid-year and end-of-year reviews.

DESIRED IMPROVEMENTS

Region VIII would like to incorporate the following improvements in its SEA tracking system

- Develop computer software programs to facilitate the mechanics of tracking progress.

- Write SEA commitments in a format which lends itself more readily to tracking.

- Develop a tracking system evaluation methodology so that information from the tracking system can be synthesized and analyzed in a timely and useful manner.

- Track progress against resource commitments as well as outputs and relate the two.

- Improve the linkage between SEA commitments and PPAs.

III.A.5. REGION X

PROCESS

Region X is attempting to use the SEA and performance agreements as means of implementing a management concept titled, "Managing for Environmental Results." This concept has been summarized in a paper presented at the 41st

FIGURE III-5

REGION X

STATE/EPA AGREEMENT TRACKING PROCESS

MANAGEMENT LEVEL	Quarterly	Semi-Annual
Regional Administrator/ Deputy Regional Administrator	Review progress with Division and OPS Directors and make appropriate policy decisions or take necessary actions.	Same as quarterly; meet with State counterparts.
Division Directors	Review progress and assist in policy decision making and action implementation.	Same as quarterly; meet with State counterparts in formal review session.
Operations Office Directors	Prepare summary progress reports; review progress with RA/DRA and Division Directors at monthly senior management meetings. Meet with State counterparts on a routine basis.	Same as quarterly; meet with State counterparts in formal review session.
SEA Coordinator	Facilitate communications; prepare and operate computerized tracking program; prepare regionwide progress report.	Same as quarterly; meet with State counterparts in formal review session.
Branch Chiefs	Prepare progress report on priority issues they are responsible for; attend review meetings as required.	Same as quarterly.

National Conference of the American Society for Public Administration in April 1980. 1/

In essence, Region X uses the SEA to identify priority environmental problems, define strategies to solve those problems and fix responsibility for the work needed to carry out the strategies. The process is seen as a method to establish several levels of accountability in both the Region and the States.

The Region's tracking system has been designed with this concept in mind. A chart presenting the steps in the SEA development process and their interrelationships is presented in Appendix J.

The organizational structure of Region X is different from that of the other EPA Regions. Each State has an EPA Operations Office (OPS) which is responsible for administering the grants. The Divisions in the Region X Office work with the OPS offices to meet EPA commitments and oversee State activities. The Resources Management Branch is responsible for coordinating the SEA process.

FEATURES

- OPS Office Directors are responsible for keeping track of priority commitments identified in the SEA for their respective States and routine State grant activities. The process that is generally followed is presented in Figure III-5.

- Key priority activities are determined in meetings by Division Directors, OPS Office Directors and the DRA. In most instances, these commitments are monitored through formal monthly progress reporting meetings and through informal day-to-day contact with State counterparts.

- OPS Office Directors and EPA Regional Division Directors report quarterly, through the SEA Coordinator, concerning the status of the SEA commitments. They give particular emphasis to problems.

- The EPA Regional Division Directors are responsible for tracking activities that EPA is committed to in the SEA. Work plans are prepared and responsible individuals on the staff are identified for a given SEA activity. Responsibility for this activity is then translated into a personnel performance agreement.

- Along with the quarterly reports, a review meeting is held with OPS Directors, Division Directors, the RA and DRA and

1/ Managing for Environmental Results, L.E. Coate and J.T. Fujita, U.S. EPA Region X. Paper presented at NASPA Conference, San Francisco, CA, April, 1980.

selected EPA program staff. A more formal and detailed meeting is held for the mid-year review with State Agency Directors. The outcome of these quarterly meetings is usually a resolution of a problem through a policy decision or a selected course of action. This can result in amendments to the SEA's and the performance agreements.

DESIRED IMPROVEMENTS

During FY 1981 Region X will attempt to improve its tracking and evaluation system as follows:

- Write the commitments in a format which will allow easier tracking and evaluation.
- Write summaries of the commitments.
- Develop performance indicators which provide a better link between SEAs, performance agreements and environmental results.
- Complete computerization of the reporting.

III.B. SECTION II - REGIONS NOT VISITED BY STUDY TEAM

III.B.1 REGION II

This Region centers most of its SEA tracking activities on the mid-year review and quarterly reports circulated to managers and staff at the Regional and State level. The SEA Coordinator conducts an on-site review with State representatives and receives a letter of progress from Branch and Section Chiefs regarding SEA activities. From this review the Coordinator prepares a list of issues relating to commitments. A staff-level review is then conducted to resolve as many problems as possible and put activities back on course. Then, to deal with problems or issues which have not been resolved, an executive-level review is held. The staff-level review consists of a meeting between Branch and Section Chiefs and Division Directors. The executive-level review is held through the RA's office and policy decisions or actions may result in contact with State Commissioners.

III.B.2. REGION III

Project Officers (program managers drawn from various Regional divisions) keep track of SEA commitments on a monthly basis according to their own internal management system -- some involving telephone conversations with relevant state counterparts. At the end of each quarter a status meeting with the State representatives and Project Officers is usually held.

At the end of the second quarter a more formal mid-year evaluation is held (also covering grant activities). A large meeting of key State staffs and Division Directors, Branch Chiefs and Section Chiefs is held for all programs. They deal with existing problems, justify or explain missed deadlines and generally chart the course for the remaining six months.

Important issues which were not resolved by this meeting are sent to the RA and Secretaries of the State Departments of Natural Resources to resolve at the policy level.

III.B.3. REGION IV

Project Officers in the State Operations Branch, Office of Program Integration and Operations, deal with the grants in the SEAs and also monitor the commitments. The actual SEA tracking is done in the programs (water, air, solid waste).

Two task leaders, one at the State level and one in the Region, are assigned to each priority issue. They work together to coordinate the efforts of their individual offices. They also work with the project officers in the State Operations Branch to make them aware of any problems or issues regarding the work to be done. Quarterly reporting is also done for the grants in the SEA (this includes on-site visits to review grant budgets and management problems). A reporting form is used to communicate from task leaders to Project Officers quarterly. As a result of these reports the task leaders and project officers can determine which issues or areas need attention. The task leaders periodically brief the RA and other top managers on progress and major problems.

III.B.4. REGION V

The tracking and evaluation system for SEA commitments is still in the early stages of evolution in Region V. Although attempts at tracking have not been formalized, the Region has many ideas about what it would like to do. Most notable is an intention to place the emphasis on environmental problem-solving and linking EPA guidance to program plans.

Much of the existing effort toward tracking centers around the mid-year evaluations. Near the end of the second quarter the Division Directors and SEA coordinator review the products and performance on SEA commitments. Exceptional problems are reviewed and acted upon by the State Coordinators in the RA's office.

At the same time, the SEA coordinator reviews SEA commitment progress through the use of an informal tracking file. He does this by occasionally (usually quarterly) reviewing SEA activities against the list of commitments. The system is currently very unstructured and the Region would like to make significant improvements in it by the next year.

III.B.5. REGION IX

Region IX is instituting a tracking system which will track SEA commitments through the grant mechanisms wherever possible. Those SEA items, not covered by a grant program will be tracked by the appropriate SEA project officer. Day-to-day tracking is conducted informally by direct contact and communication between EPA Regional and State staff. More formal evaluation will take place quarterly and at the mid-year and end-of-year evaluations. The quarterly reviews will make use of the State Agencies Quarterly Progress Reports. These reports will be reviewed by EPA Branch Chiefs and Project Officers along with appropriate State personnel. Problems that can be resolved will be handled

on the spot and those that cannot or any major slippage will be forwarded to the SEA Task Force, composed of Division Directors, State Branch Chiefs, and SEA project officers for resolution.

The mid-and end-of-year evaluations will again deal with SEA progress and will bring together EPA Division Directors and State Agency Executive Offices to assess SEA progress. As in quarterly reviews, unresolved problems will be referred to the SEA Task Force for action.

CHAPTER IV

REVIEW AND ANALYSIS

The purposes of this chapter are to identify the basic characteristics of the SEA tracking and evaluation systems examined during the Regional visits and to discuss those features which are considered to be most effective. It is neither feasible nor desirable to propose that a standardized system be implemented in all Regions. However, system components that have proven useful in one Region may be transferable to others. Such "technology transfers" can help improve tracking and evaluation nationwide while preserving the Regional individuality that is so important to the solution of their specific environmental problems. It is to facilitate these transfers that noteworthy characteristics of the regional systems are selected and discussed in the following pages.

IV.A. TRACKING AND EVALUATION CHARACTERISTICS IN THE REGIONS

The characteristics of SEA tracking systems in effect in the Regions visited have been divided into two categories: (1) those which are concerned with the process of tracking (including the organizational structure of the tracking system), and; (2) those which deal with the content of the tracking report and the degree of evaluation of the information the system provides. Figure IV-1 lists these characteristics and identifies the Regions in which they have evolved.

IV.A.1. TRACKING PROCESS AND ORGANIZATION

The group of characteristics which relate to the process of tracking encompasses the development and definition of priority commitments, the collection of tracking information, amendment of the SEA, and review and contact between State and EPA personnel. The basic organizational structure of the tracking system has proven to be quite similar in all Regions visited. Although there are minor variations, the conceptual framework for the process and organization of the systems is shown in Figure IV-2. Two notable organizational differences in assignment of personnel to the functions of monitoring and evaluation have been noted. One is to assign a senior EPA manager (usually a Division Director) and a State counterpart to be responsible for tracking all of a State's SEA issues. In the second approach, a project manager (or project officer) is named at both the EPA and the State to be in charge of tracking each particular issue. Each approach is useful in the respective originating Region and provides an internal checking mechanism to help insure that commitments are not overlooked.

IV.A.2. REPORT CONTENT AND EVALUATION

To date, the emphasis of regional tracking efforts has been placed on the collection of SEA progress information. Now that the SEA tracking process is becoming refined through its implementation, Regions are shifting their attention towards evaluating and using the information that the system provides them. This is evident in the variety of summary reports which have been developed for varying levels of management.

Environmental Protection Agency
Library Room 2404
401 M Street, SW, WSM PM-213
Washington, D.C. 20460

FIGURE IV-1

SEA TRACKING AND EVALUATION SYSTEM CHARACTERISTICS

CHARACTERISTICS	REGION				
	I	VI	VII	VIII	X
TRACKING PROCESS AND ORGANIZATION					
1. Commitments Written in Specific Trackable Format	*	x	x	*	x
2. Specific Reporting Format	x	x	x	x	
3. Exception Reporting	x	x	x	x	
4. Combined SEA, PPA and Grants Reporting (same form)			x	x	
5. Specific Progress Reporting Activity Schedule	x		x		x
6. Quarterly Reports	x	x	x	x	x
7. Mid-year Reports and Meeting with States	*	x	x	x	x
8. Year-end Review			x	x	x
9. Formal SEA Amendment Procedure			x	*	
10. Computer Assisted Tracking				*	*
11. Senior Management Review Committee	x		x		
12. Project Managers Responsible for each Issue	x	x	x		
13. Senior Level Manager Responsibile for one State's SEA Activities				x	x
14. Tracking System can be used by Staff to Present Issue Status Directly to RA	x	x		x	

x = Currently implemented to some degree

* = Planned implementation in FY 81

FIGURE IV-1 (Cont'd)

SEA TRACKING AND EVALUATION SYSTEM CHARACTERISTICS

CHARACTERISTICS	REGION				
	I	VI	VII	VIII	X
REPORT CONTENT AND EVALUATION					
15. Progress Related to Environmental Results		x			x
16. Specific Evaluation Methodology			x	*	*
17. Progress Reporting on Meeting Milestones	x	x	x	*	x
18. Progress Reporting on Meeting Manpower and Grant Estimates	*		*	*	
19. Integration of SEA and Performance Agreements				x	x
20. Review of Future Planned Activities		x	x		

x = Currently implemented to some degree

* = Planned implementation in FY 81

Very little effort has been expended on the tracking of manpower and budgetary resources information. Regions I and VII are now exploring ways to incorporate resource tracking into their systems at some future time.

Although the Regions' approaches to evaluation of progress information received from the SEA tracking system vary, they all seek to analyze and synthesize a mass of program information into a concise summary of items to be brought to the attention of top management. Top management refers to the RA's office and usually a problem-solving committee of Division Directors.

IV.B. IDEAS AND OBSERVATIONS: REGIONAL SEA TRACKING

It is clear that a considerable amount of thought and effort has been, and continues to be, directed towards the developmment, operation, and refinement of SEA tracking systems by the Regions. As a result, many innovative tracking procedures have been devised, and many useful ideas and observations made by the Regions.

The remaining section of this chapter presents significant ideas and observations about SEA tracking and evaluation which were noted during telephone conversations and visits with the Regions.

- A universal sentiment among the Regions is that those commitments written in concise, well defined terms with designated products, or outcomes, and interim milestones of achievement, are the easiest to track. Because many SEA commitments were vague, a number of Regions found it necessary to re-work them with the States in order to put them into a trackable form.

- The Regions would like to prevent the tracking of milestones from becoming a useless "bean counting" exercise. Instead, they are attempting to identify qualitative and quantitative measures which link work progress to the implementation of a strategy for achieving environmental results.

- Regional tracking systems at present have not yet incorporated the practice of monitoring of resources. It is generally acknowledged by the system operators and developers that for the purposes of SEA tracking, detailed budget and manpower information is not necessary. Its tracking would be too time consuming and cumbersome for SEA needs. Instead they would like to use round figures or estimates of resources in order to identify problems in their initial stages. This in intended to give senior management a summary of what progress is being made for what effort, where resources are being expended, and where additional technical and financial resources are needed.

- After having had at least one year's experience with tracking SEA's, many Regions are now concentrating on incorporating their tracking system design requirements into the new Agreements. Most of the emphasis is being placed on the development of new

formats and on the clarification of the language of the agreement, so that its objectives and priorities are more readily identifiable and trackable. An example of how the SEA format can aid in easing the burden of tracking (see Appendix E) has been developed by Region VII. They have designed their SEA's in such a way that a Xerox reduction of the commitments as they appear in the SEAs serve as a reporting form for a quarterly narrative of progress.

- Several Regions, and Region VI in particular, have begun to develop and track multi-media and multi-year strategies in order to devise workable solutions to environmental problems. They have recognized that the SEA process, and the tracking and evaluation systems, have given them the flexibility to integrate program activities. This has enabled the Regions to approach environmental problems in a more comprehensive way, outside of the sometimes narrow confines of program categories.

- Duplication of effort in internal reporting is of great concern to all Regions. In an effort to eliminate some of the duplication, several Regions have begun to combine reporting activities for the grants, and in one case even the PPAs, into their SEA tracking and evaluation systems. The elimination of burdensome progress requirements in the Regions and States through the SEA tracking process has enhanced Staff acceptance of the SEAs.

- During the course of the fiscal year adjustments are often made to the SEA work plans and commitments in order to adapt to unforeseen reallocations of resources or priorities. Regions have found that if changes are not formally communicated to the proper managers in the SEA process, serious problems with activity scheduling, tracking and evaluation can result. One Region's attempt to overcome this potential problem has resulted in a formal SEA amendment process for the Region. It consists of a letter of notification (see Appendix H) to the SEA Coordinator which explains the change and notes any impacts expected as a result of it. It also outlines the reasons for the needed amendment. The SEA Coordinators incorporate the changes into the SEA work plans, notify potentially affected parties of the amendment, and keep the letter on file in the Coordinator's office.

CONCLUSION

This study has described several of the SEA tracking and evaluation systems now being used by EPA Regional Offices. It has highlighted how the Regions have attempted to develop SEA tracking and evaluation systems which best accommodate their own particular management structures and needs. It is hoped

that through the comparison of the systems in this report Regions might be better able to assess the strong and weak points of their own systems in relation to other Regional systems. This assessment should encourage sharing or borrowing ideas among Regions, and also stimulate new ideas to improve current methods and to fill in gaps in present systems.

APPENDIX

APPENDIX A

CHAPTER III INTERVIEWEES

LIST OF EPA STAFF INTERVIEWED BY TELEPHONE

REGION II

Mike Bonchonsky, SEA Coordinator

Joanne Brennan, SEA Assistant Coordinator

REGION III

George Pence, SEA Coordinator

Paul Ambrose, Delaware Operations Director

REGION IV

Henry Hudson, SEA Coordinator

REGION V

Dave Stringham, SEA Coordinator

REGION IX

Catherine Kuhlman, SEA Coordinator

CHAPTER 3 INTERVIEWEES

LIST OF EPA STAFF INTERVIEWED ON VISITS

REGION I

Robert Thompson, Acting Deputy Regional Administrator

George Mollineaux, SEA Coordinator

Patricia Meaney, Director, Analytical Center

Charles Murray, Director, Water Division

Louis Gitto, Director, Management Division

CHAPTER III INTERVIEWEES (CONT'D)

REGION VI

Fran Phillips, Deputy Regional Administrator

Ray Lozano, SEA Coordinator

Tony DiRosario, SEA Staff

Myron Knudson, Director, Water Division

Mac Weaver, Director, Water Supply

William Hathaway, Director, Enforcement Division

REGION VII

Don Christenson, Director of External Affairs

Gene Ramsey, SEA Coordinator

Ralph Langaemeier, SEA Assistant Coordinator

Dan Vallero, SEA Assistant Coordinator

Louise Jacobs, Director, Enforcement Division

REGION VIII

Gene Lucero, Deputy Regional Administrator

Joan Barnes, SEA Coordinator

Marcie Osterholt, Program Analyst, Resources Management Branch

Carl Worster, Chief, Computer Services Branch

Marshall Payne, Chief, Surveillance Branch

David Emery, Director, Management Division

SEA Staff: Ken Alkema, Sam Marquez, Ed Stearns, Bill Basbagill, Loretta Pickerell, Duane Traylor

David Kircher, Air and Hazardous Material Division

Terry Anderson, Economist, Office of Analysis & Evaluation

Pat Godsil, Chief, Planning & Management Branch, Water Division

Harvey Hormberg, Chief, Office of Public Facilities Grants, Water Division

Pat Crotty, Drinking Water Branch, Water Division

REGION X

L. Edwin Coate, Deputy Regional Administrator

Nora McGee, SEA Coordinator

Joanne Fujita, SEA Assistant Coordinator

Lyman Neilson, State of Washington Operations Office Director

Gary O'Neil, Director, Surveillance and Analysis Division

Issue No. _____

APPENDIX B

QUARTERLY STATUS SHEET

1980 State/EPA Agreements

Division Director:
Project Manager:
State:
Issue:

As of 1/1/80, have all EPA milestones in the SEA been met? Yes _____ No _____
As of 1/1/80, have all State milestones in the SEA been met? Yes _____ No _____

Please write a brief paragraph discussing project highlights and newsworthy items. If any milestones have not been met, is this a significant problem? Are there any other significant problems? If so, please explain the nature of the problem(s) and what action is being taken.

I. REGION I TRACKING REPORTING FORM

Division Director's Recommendations for follow up:
RA:
DRA:
Division Director:
Project Manager:
Other _____

RA/DRA Recommendations for follow up:
RA:
DRA:
Division Director:
Project Manager:
Other _____

Follow-up actions taken:

Return to Patricia Meaney, Analytic Center, by January 16, 1980.

APPENDIX C

Vermont Issue #2: ST. ALBANS BAY RESTORATION PROJECT

Description of Issues:

Vermont continues to place a very high priority on the restoration of St. Albans Bay. The State will establish a St. Albans Bay Restoration Project to be managed and directed by the Agency of Environmental Conservation acting through the Department of Water Resources and Environmental Engineering in cooperation with the Environmental Protection Agency. The objective of this project is to restore the waters of St. Albans Bay to their maximum sensible recreational and economic potential through sound water quality management practices. This objective will be achieved by a three-phased program: (1) upgrade the St. Albans City Municipal Wastewater Pollution Facility including phosphorus removal; (2) conduct in-bay restoration activities; and (3) implement recommended nonpoint source treatment proposals. During FY 1980, the State of Vermont and EPA should agree upon a detailed strategy for implementation and begin implementing the strategy.

OBJECTIVE	MILESTONES		AGENCY CHARGED	FY 1980 RESOURCES				PROJECT MANAGERS	
				WORKYEARS		DOLLARS (000)			
	DESCRIPTION	DATE		STATE	EPA	STATE	EPA-amt/source	STATE	EPA
A. Upgrade St. Albans City municipal waste water treatment facility, including phosphorus removal. B. Conduct in-bay restoration activities. C. Implement non-point source treatment proposals.	1. Step I grant application for facilities plan for City of St. Albans submitted to EPA.	Oct. 1	Vermont AEC	0.1	0.2	$ 6*	$ 12*	W. McLean	R.Manfredonia
				Water Division	Water Quality Section		CWA §§ 208, 314,205(g)*	(802) 325-9987	(617) 223-5673
	2. State submits an updated strategy for the restoration of St. Albans Bay in cooperation with EPA. Update would include: a. Status report of Rural Clean Water Application for St. Albans Bay which is being developed in conjunction with the Soil Conservation Service, U.S. Department of Agriculture; and b. Status report of Corps of Engineers application for weed harvesting in St. Albans Bay.	Nov. 1	AEC		Construction Grants Section				
	3. EPA reviews preliminary strategy and provides State with comments. EPA reviews and approves (or recommends changes as needed) to facilities plan application for City of St. Albans.	Dec. 1	EPA				* Hypothetical Entries		
	4. State finalizes strategy and submits to EPA.	Jan. 1	AEC						

II. REGION I - EXAMPLE OF PRIORITY ISSUE DESCRIPTION

APPENDIX D

STATE A FY 80 SEA

2nd QUARTER REPORT - MARCH 24, 1980

SAMPLE PAGE

1. Water Supply Supervision

   a) Item L-17: State hired a full-time water and wastewater training coordinator (1/31/80).

   b) Item L-19: The Division of Environmental Services (DES) has a vacancy for an ADP person in their water supply program.

   c) Item L-24: State began submitting quarterly reports to EPA. First quarter report submitted to EPA on February 21, 1980.

   d) Item L-28: During the first 6 months of FY 80, EPA responded to Bossier City complaints about high color in the Red River. Also responded to complaints about alleged PCB contamination of public drinking water wells in Lake Providence, LA.

All other items are status quo and progressing in their usual manner.

2. (UIC) Underground Injection Control Program

   Department of Natural Resources identified no tasks in program plan with definite March completion date, however, work on several program elements is progressing. Work underway includes hydrologic investigations of the Chicot, Evangeline, Jasper, Wilcox, Sparta and Coxfield Aquifers; preliminary investigations regarding characterization and inventory of injection wells. Preliminary investigative work has also been initiated for 1) determining the aquifer recharge potential for the lignite mining area and high density areas; 2) inventory of shallow aquifers being used as potable water supplies for Baton Rouge - New Orleans corridor; lignite mining area(s) and potentially hazardous areas; 3) establishment of a data bank; and 4) initiation of well inventory.

Environmental Protection Agency
Library
Room 2404
401 M Street, SW, WSM PM-213
Washington, D.C. 20460

APPENDIX E

REGION VII

SAMPLE NARRATIVE REPORTING PAGES

NEBRASKA/EPA AGREEMENT

PRIORITY 6 - Safe Drinking Water

Issue:

The Integrity of public water supplies in Nebraska must be maintained at a level which provides the citizens of the State clean, safe, potable water. The Nebraska Department of Health is vested with the responsibility for this program as required under Nebraska statutory authority and the Safe Drinking Water Act.

Strategy:

The Nebraska Department of Health, through continued primacy statutes, will provide continuing operation of the Public Water System Surveillance Program of the Safe Drinking Water Act. These efforts will be coordinated, where necessary, with other Nebraska departments which share concern and responsibility for ground water utilization and integrity.

Nebraska Commitments:

1. The Department of Health will maintain primacy for Safe Drinking Water Act and carry out the enforcement activities described in the narrative submitted with the application for Categorical Public Water System Surveillance Program grant funds. The Department will also participate in the Nebraska Water Planning and Review Process as a means of coordinating environmental and public health considerations associated with resource management.

APPENDIX E (CONT')

2. The Department of Health will prepare annual reports of violation and enforcement actions on forms provided by EPA. The D.O.H. definitions of violation will be used and the reports will be in detail negotiated between the CSSE State Liaison Group and EPA.

EPA Commitments:

1. The Regional Office will attempt to provide funds in conjunction with the laboratory review under #8 (Laboratory) for the purchase of an Auto-technico system and Gas Chromatograph Mass Spectrometry Instrument for the State of Nebraska.

1. Auto-technicon purchased by Nebraska with own funds. A needs assessment is underway to determine need for G.C.M.S.

2. EPA will provide an evaluation relative to upgrading all laboratory capabilities to meet EPA quality assurance levels as referenced in Issue #8 (Laboratory).

2. Planned for third quarter.

3. EPA will provide the forms and training to DOH staff for the annual report.

3. Completed 1/17/80.

Joint Commitments:

1. The Nebraska Department of Health and EPA will jointly review the reporting requirements of the water supply program in an attempt to simplify these requirements in future years. This Review will take place by or as part of the mid-year evaluation.

1. Planned for April 1980. May 20, 21, 22, 1980.

2. The Nebraska Department of Health and EPA will jointly develop a program to provide information and advice relative to a sound cross-connections program by February 1, 1980, which can be promoted and administered throughout the State.

2. In progress 1st quarter (planning). Information provided January - 2nd quarter.

3. Corrosion control, particularly in asbestos/cement pipe, is receiving nationwide attention. The Nebraska Department of Health and EPA will jointly develop a program by March 1, 1980, to provide information and guidance to those water supplies which are experiencing corrosion problems or have potential for corrosion.

3. In progress. Information provided in January.

APPENDIX E (CONT'D)

Contacts and Resources

DEC	Contact: Cliff Summers FIS 541-2674	Workyears: 14.0
EPA	Contact: Jo Ann Basel 816-374-5429	

APPENDIX F

REGION VII

OFFICE OF EXTERNAL AFFAIRS

First Quarter

January 18 - EPA internal program's reports on commitments due to EXTR.

January 25 - State's reports on commitments and PPAs due to EPA.
- EPA reports on commitments due to the States.

February 1 - SEPA exception report due on unfulfilled commitments.

Before February 15 - Meetings to discuss problems (only as necessary).

Second Quarter

April 18 - EPA program's reports on commitment due to EXTR.

April 25 - State's reports on commitments and PPAs due to EPA.
- EPA reports on commitments due to States.

May 2 - SEPA exception report due on unfulfilled commitments.

Before May 16 - Midyear meetings with States for review.

Third Quarter

July 18 - EPA program's reports on commitments due to EXTR.

July 25 - State's reports on commitments and PPAs due to EPA.
- EPA reports on commitments due to the States.

August 1 - SEPA exception report due on unfulfilled commitments.

Before August 15 - Meetings to discuss problems (only as necessary).

Fourth Quarter

October 17 - EPA program's reports on commitment due to EXTR.

October 24 - State's reports on commitments and PPAs due to EPA.
- EPA reports on commitments due to States.

October 31 - SEPA exception report due on unfulfilled commitments.

Before November 14 - End of year review meetings with States and programs.

If you have any questions about the schedule, please contact Gene Ramsey in State/EPA Agreements at extension 3143.

APPENDIX G

ALL STATE COMMITMENTS FOR ONGOING PROGRAM ACTIVITIES

(by activities in chronological order)

REGION VII

Objective	Activity	Projected Accomplish.	FY-81 Accomplishments 1st Q	2nd Q	3rd Q	4th Q	Completion Date	FY-81 Workyears (State)	Resources Grant to State	Program	Responsible Agency
Provide Groundwater Pollution Control Program - (Including UIC)	1. *Hold a seminar on nitrates in Grand Island.		1				10-31-80	1.50	7.5k	CWA 208	NRC/NDH
	2. *Fund third year of special ASC project in Hall County		1				10-31-80	1.50	130K	CWA 208	NRC
	3. *Hold Seminar in Worms on Nitrates		1				11-30-80	1.50	7.5k	CWA 208	NRC/NDH
	4. *Draft report on other nitrate sources		1				11-30-80	1.50	50k	CWA 106	NDEC
	5. *Draft plan for UIC		1				12-31-80	.50	15k	SDWA	NDH
	6. *Finalize nitrate report			1			3- 1-81	1.50	25k	CWA 106	NDEC
	7. *Submit map of detection devic aiting for Nitrates						3-30-81	1.00	5k	SDWA	NDH
	8. *Begin operation of detection devices for Nitrate				1		6- 1-81	.50	0	SDWA	NDH
	9. *Prepare draft activity/assessment protocol					1	9-30-81	16.50	60k	SDWA/CWA 106 & 208	
	10. Conduct inspections at all public owned water supplies under 1445(b)	20	5	5	5	5	9-30-81	5.50	4k	SDWA	NDH
	11. Provide review of variances to assure 1415(a) schedules are being met.	220	50	55	55	60	9-30-81	18.50	900k	SDWA	NDH
	(SEA) *Commitments for Priority Problems			reviews							

APPENDIX H

SECOND AMENDMENT TO FY-80 NEBRASKA/EPA AGREEMENT

PRIORITY 3-C NEBRASKA DEPARTMENT OF ENVIRONMENTAL CONTROL COMMITMENT NUMBERS 1a, 1b, 1c, 1d, 1e, and 1f are hereby revised to read as follows (changes are underlined):

1. a) Assist the Regional EPA office to update the lists for the Hazardous Waste Notification Program by March 30, 1980.

   b) Evaluate EPA Regulations by September 30, 1980 to develop State Hazardous Waste Management Regulations.

   c) Utilize the information from the Hazardous Waste Notification Program to update or conduct the registration of generators, licensing oif transporters and permitting of (interim) facilities by December 31, 1980.

   d) Develop the interim authorization application to operate the Federal Hazardous Waste Management Program and conduct the public participation requirements by September 30, 1980.

   e) Submit the authorization application and develop a memorandum of agreement with the Regional EPA office by September 30, 1980.

   f) Begin implementation of the Nebraska Hazardous Waste Management Program by September 30, 1980 or on the schedule presented in the approved interim authorization plan.

PRIORITY 3C ENVIRONMENTAL PROTECTION AGENCY COMMITMENT NUMBERS 1, 2, 4, 5, and 6 are hereby revised to read as follows (changes are underlined):

1. At least two visits will be provided by the Regional EPA office on the development of the interim authorization application and conduct of the public participation requirements by June 30, 1980.

2. Review of the necessary public participation activities on the interim authorization application by September 30, 1980

4. Provide Hazardous Waste Notification information to NDEC for use in their program implementation by September 30, 1980. and December 30, 1980.

5. A computer software package for integration of the EPA and NDEC Hazardous Waste Program will be provided by September 30, 1980.

6. Develop a public education and information program to assist the regulated community and the public to understand and support the establishment of new hazardous waste management facilities, comply with the new hazardous waste management facilities, comply with the new hazardous waste regulations and report alleged problem sites by August 30, 1980.

APPENDIX H (CONT'D)

The undersigned have executed this Amendment to the Agreement on the day and year specified below.

U.S.ENIRONMENTAL PROTECTION AGENCY, REGION VII

By: Kathleen Q. Camin
Kathleen Q. Camin, Ph.D
Regional Administrator

Date: 4/24/80

NEBRASKA DEPARTMENT OF ENVIRONMENTAL CONTROL

By: Dan T. Drain
Dan T. Drain
Director

Date: 4/29/80

APPENDIX H_2

RATIONALS FOR AMENDMENTS

When the FY-80 Agreement was negotiated, both the State and EPA anticipated an earlier publication date for the Hazardous Waste Regulations. EPA was late in publishing several of the regulations. These delays necessitate a change of dates in this portion of the Agreement.

APPENDIX I

REGION VIII

IV. STATE/EPA AGREEMENTS: RA's TRACKING LOG

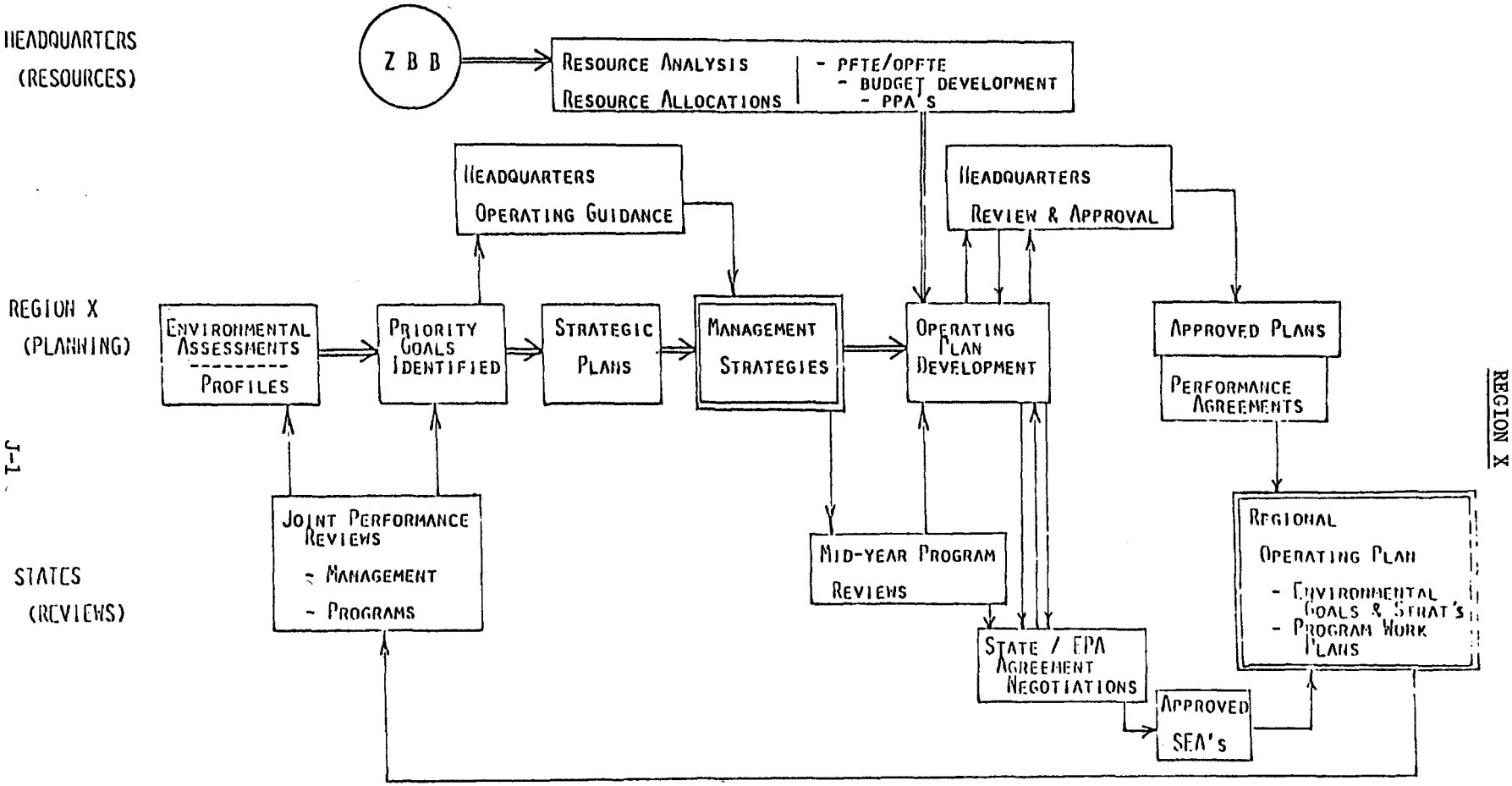
HAZARDOUS WASTES CONTROL PROGRAM	CO		MT		ND		SD		UT		WY	
	Due Date	Status	Due Date	Status	Due Date	Status	Due Date	Status	Due Date	Status	Due Date	Status
1. Develop Authorization Plan and Apply for Interim Authorization*	5/80	(2)	5/80	(2)	5/80	(2)	5/80	(2)	5/80	(2)	5/80	(2)
a. Submitted to EPA by the State												
b. Approved by EPA												
2. Develop enabling legislation required for full authorization	12/79	(2)	-	(4)	4/80	(2)	2/80	(2)	1979	(4)	12/79	(4)
a. Enacted by state				(4)						(4)		
b. Approved by EPA												
3. Develop procedures for issuing permits			12/80	(2)	12/80	(2)	9/80	(2)	10/80	(1)	10/80	(2)
4. Develop procedures to satisfy EPA's inspection, monitoring, and reporting requirements			10/80	(2)	12/80	(2)	9/80	(2)	10/80	(1)	10/80	(2)

STATUS CODE:

(1) Ahead of Schedule
(2) On Schedule
(3) Behind Schedule
(4) Completed
(5) Discontinued or Revised

* RCRA 3001 regulations will now not be out until April 1980. This delays the promulgation of regulations approximately three months and thus will change S/EA due dates.

V. MANAGING FOR ENVIRONMENTAL RESULTS



ON-GOING EVALUATIONS: PERFORMANCE // MANAGEMENT INFORMATION // ACCOUNTABILITY

APPENDIX K

III. KANSAS ONGOING COMMITMENTS
(Quarterly unless otherwise indicated)

WATER

Water Quality

- Develop and submit draft FY-82 Construction Grant priority list by May 1, 1981; and final list by July 15, 1981.
- Submit quarterly updates of FY-81 Construction Grant priority list.
- Submit Section 109 grant application for facility to train wastewater treatment plant operators and maintenance personnel by March 31, 1981.
- Update 5-year Water Quality Management strategy and develop FY-82 Work Program by March 31, 1981.
- Provide annual report of status of implementation of the Water Quality Management Plan by December 31, 1980.
- Submit final Clean Lakes ranking by September 30, 1981.
- Revise Water Quality Standards by September 30, 1981.
- Submit by September 30, 1981, at least four Step 3 applications for land treatment projects including at least one such application by March 31, 1981.
- Prepare by March 31, 1981, and submit for EPA concurrence, design standards for Overland Flow and Rapid Infiltration modes of land treatment.
- Develop and submit for EPA concurrence by March 31, 1981, a State policy to enforce manufacturers' warranties on wastewater processing equipment.

Water Supply

- Make _____ annual inspections of community water supply systems.
- Review _____ plans of public water supplies.
- Submit _____ reports of compliance actions for violations of Maximum Contaminant Levels and monitoring requirements on Federal Reporting Data System (FRDS) forms; including: 1) Analytical results of violations and 2) the MOL violated.
- Submit annual report by December 31, 1980.

Permits

- Issue _____ Best Available Technology (BAT) permits for major primary industries by NPDES guidelines.
- Issue _____ BAT permits for major secondary industries by guidelines.
- Issue _____ BAT permits for major primary industries by Best Engineering Judgement (BEJ).
- Reissue _____ permits for publicly owned treatment works (POTW's) with secondary treatment limitations.
- Reissue _____ permits for POTW's with Section 301 (i) extensions.
- Reissue _____ permits for POTW's with administrative orders.
- Issue _____ permits for major federal facilities.
- Submit pretreatment plans for _____ municipalities.
- Approve pretreatment plans for _____ municipalities.
- Submit effective permits incorporating pretreatment for _____ municipalities.
- Implement pretreatment for _____ municipalities.
- Provide written procedures for the initial screening and substantive technical evaluation of all compliance related information by November 11, 1980.
- Provide for the maintenance of a comprehensive inventory of all sources covered by NPDES permits including provisions for forecasting of reporting requirements by July 1, 1981.
- Provide written procedures for the determination of appropriate enforcement responses to identified NPDES permit violations by December 31, 1980.
- Prepare quarterly noncompliance reports in accordance with current NPDES regulations by September 30, 1981.
- Implement the National Municipal Policy and strategy and the Municipal Management System by January 31, 1981.

Field Inspections

- Make sampling inspections of _____ major dischargers.
- Make non-sampling inspections of _____ major dischargers.
- Make performance audit inspections of _____ major dischargers.
- Make _____ pretreatment inspections.
- Make _____ biomonitoring inspections.
- Submit to EPA a copy of the final inspection report for all major dischargers.

AIR

Enforcement

- Determine compliance status of Class A Sources in attainment areas, status unknown, as of September 30, 1980.
- Inspect Class A1, NSPS & NESHAPS sources, in attainment areas once during Fiscal Year.
- Inspect Class A2 sources in attainment areas once every 2 years.

NOTES: Other ongoing commitments are included in the Priority Problems Section and the Air Enforcement Protocol included in the SEA by reference.

SOLID WASTE

Management

- Conduct _____ on-site inspections of solid waste disposal facilities.
- Participate in Urban Grants awarded to municipalities or counties in the State; including planning, review and management.
- Conduct an evaluation of the open dump inventory by August 15, 1981; report on those facilities declared as open dumps.
- Revise the draft solid waste management plan by June 30, 1980.
- Close _____ open dumps, upgrade _____ open dumps, and report efforts to prevent new open dumps.