Region 10

Compliance Assurance Achievement Highlights

[excluding Superfund]

Fiscal Year 2005

Compliance and Enforcement Programs — Sustained Environmental Progress

EPA Region 10 continues its important work of ensuring that the environment is protected through judicious use of compliance assistance, monitoring, incentives, and when needed, enforcement—whether administrative, civil or criminal.

Environmental highlights for Fiscal Year 2005 (FY05) show sustained progress:

- As the result of EPA Region 10 compliance actions, some 14 million pounds of pollutants are being reduced or treated; over 834,000 cubic yards of contaminated soil cleaned up, and another 7,000 cubic yards of hazardous waste being otherwise properly managed. Also, an estimated 4 million cubic yards of groundwater are being cleaned up.
- As a result of inspections, over 266,000 gallons of underground gasoline and diesel storage-tank capacity will now have reduced ability to leak into groundwater, soil and surrounding communities. This is in addition to the more than 500,000-gallon capacity of above-ground tanks that Region 10 has ensured will have the proper containment to avoid environmental damage in nearby communities.
- Almost 350 acres of wetlands are being protected or restored.
- The Region conducted 1,221 inspections, about the same number as last year.
- At those inspections, compliance information was provided to more than half of those facilities.
- To further improve understanding of environmental responsibilities by the regulated community, Region 10 held 41 workshops and training sessions throughout the four states; visited 69 facilities for compliance assistance rather than inspections; distributed some 30 brochures, websites and similar informative tools; and provided 68,500 facilities with information about meeting environmental standards.
- Enforcement actions collected nearly \$2.5 million in penalties. In addition, facility owners agreed to make environmental improvements that are estimated at \$67.5 million. In a few cases, as part of settlement, companies agreed to conduct Supplemental Environmental Projects (SEPs), estimated to cost a little more than \$468,000.
- Region 10 uses Expedited Settlements, which allow faster resolution of some kinds of violations with smaller penalties. These were used in 70% of the penalty actions taken.

Compliance with environmental regulations benefits everyone by maintaining the clean air, water and land essential to our Northwest and Alaskan life. EPA Region 10 is dedicated to protecting these essentials for the people and communities. The following highlights are examples of the environmental or public health problems we have worked on. They illustrate the variety of compliance assistance and enforcement done this past year.

Michael A. Bussell, Director

Office of Compliance and Enforcement

PROTECTING OUR WATER RESOURCES

Sustained Storm Water Initiative Results in Continued Compliance Improvement

Fiscal Year 2005 was Region 10's fifth year of an integrated storm water compliance strategy for construction sites in Idaho and Alaska. The first years focused on extensive outreach and compliance assistance. The last two focused on compliance and enforcement. Control of construction site runoff protects nearby streams and rivers from silt, excess nutrients, oil and grease, and other harmful pollutants that affect water quality and fish survival. The regulations require that construction sites larger than one acre apply for a permit and develop a storm water pollution prevention plan. During the year, the Region saw a continual upward trend in compliance rates.

Building on the previous year's accomplishments, EPA continued its inspection and enforcement effort. In addition, compliance assistance workshops were provided to help small business owners understand their responsibilities under storm water regulations. Region 10 conducted 80 inspections at construction sites, leading to 63 enforcement actions: 40 Expedited Settlement Offers; 12 Notices of Violations; the rest were traditional penalty cases. Notices of Violations are informal enforcement actions. Formal enforcement actions include the Expedited Settlement Offer (ESO), which is used where the violations are minor and the violator can quickly correct the problems. In administrative penalty cases, where violations are of greater magnitude, the penalty amount is larger. It is estimated that as a result of



A sedimentation basin for storm water control

enforcement actions, over 9 million pounds of sediments were prevented from reaching nearby water bodies.

By FY05, the number of operators in Idaho and Alaska applying for coverage under a Construction General Permit more than doubled, an increase of some 950 permittees. Inspectors in the field note that even in remote areas, construction site operators are now aware of the Construction General Permit and are applying for coverage. In contrast to the previous year, operators at most inspected sites had developed some form of storm water pollution-prevention plan.

These are encouraging signs that EPA's storm water compliance strategy is having a positive impact. However, the number of enforcement actions resulting from inspections indicates that sustained implementation of the integrated storm water compliance strategy is still needed.

Efforts Continue to Increase Compliance in Alaska's Seafood Industry

EPA and the Alaska Department of Environmental Conservation (ADEC) co-sponsored a free workshop for Alaskan seafood processors in December 2004. About 100 people attended the continuing education workshop on compliance with EPA's Seafood General Permit. The workshop supported the Region's integrated seafood compliance strategy, which balances compliance assistance and enforcement throughout the seafood sector.

Also in FY05, eight Alaskan seafood processors settled enforcement cases with EPA. The penalties ranged from \$11,000 to \$85,000. The enforcement actions resulted from violations documented during compliance

inspections and information from self-reporting documents, such as annual reports. Common violations included failure to grind seafood waste to one-half inch or less; failure to conduct monitoring; unauthorized discharges; failure to develop Quality Assurance/Quality Control plans; and exceeded effluent limits.

Through Region 10's integrated strategy, the seafood industry is paying more attention to its permit requirements. By protecting water quality, seafood processors help insure the future of their industry.

PROTECTING OUR WATER RESOURCES continued

Underground Storage Tank Compliance Assistance Workshop

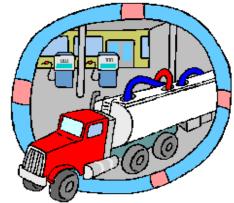


In September 2005, the Underground Storage Tank (UST) program provided a free workshop in Boise, Idaho for all UST owners, operators, and service providers. The workshop targeted service providers to inform them of impending regulatory changes due to the adoption, in August, of the Underground Storage Tank Compliance Act as part of the Energy Policy Act of 2005. A similar workshop is planned for the spring of 2006.

UST Enforcement Reaches a New Level

FY05 was an active year for the Underground Storage Tank program.
Region 10 conducted 205 inspections.
Because Idaho does not have a state UST program, EPA has focused its inspection presence in Idaho for the past two years. With the help of out-of-region inspectors, EPA is conducting three times as many inspections there as were done prior to 2004. As a result, the significant operational compliance rate of facilities in Idaho has increased from 32% in late 2003 to 52% in late

2005.



EPA thinks that the increasing compliance rate is a result of more inspections and a better informed regulated community. This is important to everyone in Idaho since groundwater is widely used for drinking water. Ensuring that underground tanks are operated properly protects against leaks, which can contaminate drinking water.

A Close Look at Shallow Waste-Disposal Wells in Alaska

EPA directly implements the Class V Underground Injection Control (UIC) Well program in Alaska. A Class V well is a shallow drainage well used for disposal of fluids. This type of well can be of concern because fluids discharged into the ground can contaminate groundwater that is used for drinking water. Region 10 records show some 1,500 active and closed wells of this type in Alaska. The Agency inspection focus there has been motor vehicle repair facilities that use floor drains for managing fluid run-off. When a drain of this kind leads to a septic system, leach field, dry well or other entry point into the subsurface, it is classified as

a "motor vehicle waste-disposal well." Such wells are banned nationally, and EPA has identified them as a priority for closure because of the potential for contamination of groundwater.

During FY05, Region 10 conducted Class V UIC inspections at 147 facilities throughout Alaska, including the communities of Anchorage, Eagle River, Fairbanks, Juneau, Kenai, Ketchikan, Nome, Palmer, Soldotna, and Wasilla. 237 new UIC wells were inventoried.

continued

PROTECTING OUR WATER RESOURCES continued

Shallow Waste-Disposal Wells in Alaska

EPA did many joint inspections with inspectors from the Alaska Department of Environmental Conservation (ADEC). In some cases, ADEC specifically requested our assistance on sites with known UIC problems. In other cases, we simply tapped into local knowledge to improve our efficiency, which saved time and effort.

Results for FY05

Number of Class V UIC inspections conducted:147 Number of new Class V UIC wells inventoried: 237 Number of banned UIC wells closed: 8 Number of "permit or close" enforcement actions initiated: 42

Oregon Rancher Settles Clean Water and Endangered Species Violations

In the late 1990's, George Gabriel, owner of the Pallette Ranch near Joseph, Oregon, conducted construction and fill activities along the Imnaha River without prior authorization from the Army Corps of Engineers. The violation resulted from construction of earthen and gravel levees along a two-mile segment of the upper river. When the levees were constructed, portions of the river were channelized, riparian vegetation was removed, wetlands were filled, and five large, active sidechannels were blocked and dewatered. Following a series of inspections, Gabriel's fill action was found to be a Clean Water Act (CWA) violation resulting in the "unlawful take," under the Endangered Species Act (ESA), of threatened Snake River salmon and trout.

To resolve these violations, Mr. Gabriel reached a settlement with the U.S. Department of Justice, EPA and the National Oceanic and Atmospheric Agency (NOAA) Fisheries. Mr. Gabriel agreed to pay a \$165,000 penalty and conduct a holistic restoration project on a stretch of the Imnaha River that federal officials expect will restore vital endangered species habitat, while accommodating his needs as a ranching landowner.

In addition to the penalty and restoration project, Mr. Gabriel agreed to develop two community projects worth over \$50,000: 1) provide funding to the Nez Perce Tribe for maintenance of the only hydrologic gauge located on the Imnaha River; and

2) relocate the Crazyman Creek recreational trail to a safer location, with new public parking at the far end of the Pallette Ranch.

An interagency technical group—EPA, NOAA Fisheries, Oregon Division of State Lands, the Nez Perce Tribe, U.S. Fish and Wildlife Service, and U.S. Forest Service representatives—has been working with Mr. Gabriel, his contractors and consultants to develop a suitable habitat restoration proposal. This case marks the first time in NOAA's ESA enforcement program that NOAA Fisheries has sought to enforce the ESA "take" prohibition based almost exclusively on destruction of habitat. This case is also the first joint CWA/ESA enforcement case for EPA and NOAA Fisheries.



Pacific Northwest Salmon

DRINKING WATER

Public Health Results at Scofield Water System

Many small drinking water systems provide water to communities in Region 10. These small systems present significant challenges for the system operators and regulators, due to the regulations that must be followed to provide clean, safe water. The following example shows when and how EPA gets involved in these small but challenging enforcement cases, using a creative enforcement approach to gain compliance.

In July 2004, the State of Oregon referred the Scofield Mobile Home Park to EPA for action. Scofield is a very small community system serving 40 individuals through 19 connections. It had gone through several ownership changes in recent years. In 2003, the State had fined Scofield \$108,133 for ongoing discharges of untreated sewage. These sewage discharges were affecting the drinking water system. EPA prepared a draft Administrative Order citing continuous monitoring and reporting violations for coliform, inorganic compounds, nitrate, volatile organic compounds, semi-volatile organic compounds, lead and copper, as well as failures to undergo a sanitary survey and public notification. Because of the many violations and recent State penalties, EPA offered compliance assistance to the owners, while still reserving the threat of impending formal federal enforcement if the park



failed to cooperate.

Since January 2005, EPA has worked directly with the engineering firm hired by Scofield to correct the sewage discharge problems.

EPA and Scofield worked together to develop a compliance plan, and to date, all past violations have been resolved. Scofield is currently working with Oregon to complete the Consumer Compliance Report and to hire a certified operator. As a result of EPA's direct involvement, people in the community are now assured of safe drinking water.

State of Washington Consumer Confidence Reports (CCR) Compliance Initiative

As the result of an EPA-Washington State initiative, compliance with the CCR Rule in the state increased from about 85 percent to nearly 100 percent. A CCR is an annual snapshot of drinking water quality. It must be mailed by a public water system to its users every summer. CCRs are the centerpiece of public right-to-know provisions under the Safe Drinking Water Act (SDWA).

To accomplish this increase in compliance, EPA worked closely with the Washington Department of

Health (DOH) and sent 96 "push" letters to water systems that had not sent out their CCRs. About half of these systems did not initially respond to the letters, so EPA and DOH contacted them by phone. Most of the systems subsequently returned to compliance and prepared the report. After this outreach, five public water systems still had not responded. EPA issued an Administrative Compliance Order to each one to ensure that the report was completed.

PESTICIDES AND TOXICS

Auction Houses Warned about Selling Equipment with PCBs

In response to complaints that electrical equipment with leaking polychlorinated biphenyls (PCBs) were being offered for sale, the Region 10 PCB program undertook a special compliance assistance project for auction houses. As a result, the program mailed to some 150 businesses in the Pacific Northwest and Alaska a letter and the brochure "What Auction Houses Need To Know about Selling Equipment Containing PCBs." The mailing included such basic information as: the

risks to human health posed by PCB's; what kinds of equipment are likely to include the hazardous chemical; how



to check for leaks; rules for storage and disposal under the Toxic Substances Control Act; and how to properly care for and dispose of leaking equipment.

To measure the effectiveness of the distributed information, a follow-up survey was done of businesses that had been sent the information. EPA found that 43% of the establishments contacted said they were aware that the sale of leaking PCBs is illegal; 48% said they were aware of the need to check for leaking PCBs; and 22% were familiar with the procedures for handling leaking PCB electrical equipment. To further assess the project's value in encouraging environmental stewardship and proper control of PCBs, EPA will conduct compliancemonitoring inspections at some of the auction houses in 2006.

Argent Chemical Pesticides Case Settled

In May of 2005, Region 10 resolved one of the largest federal pesticide cases ever brought by EPA in the Northwest. The Agency settled an enforcement action against Argent Chemical Laboratories in Redmond, Washington. Argent had been illegally producing, selling, and distributing several pesticide products in ways that posed a significant threat to human health and the environment. They sold unregistered pesticides; sold restricted-use pesticides to uncertified users; exported pesticides without appropriate foreign labels; produced pesticides in an

unregistered establishment; and failed to file annual production reports.

The settlement requires the Company to cease production of over 150,000 pounds of unregistered pesticides annually. It severely curtails the annual sale of more than 100,000 pounds of pesticides in the U.S. and over 125,000 pounds annually in other countries. In addition, the settlement penalized the Company \$300,000.

WORKING EFFECTIVELY WITH TRIBES

Pesticide and Air Compliance Issues on the Yakama Reservation

EPA responded to compliance problems on the Yakama Reservation last year with increased oversight of pesticide application and worker-safety practices. Working closely with a local pesticide inspector funded through a tribal agreement, the Region 10 Pesticide Program pursued enforcement actions for potentially unsafe application practices. Both tribal and non-tribal pesticide users within the Reservation were cited. In the case of the tribal business, Yakama Land Enterprise, that firm was fined \$5,664 for multiple violations. They included illegal drift of pesticides onto an organic cherry orchard; failure to post warning signs; allowing drift onto a person in the orchard area; and violations of the Worker Protection Standards for inadequate training and education of farm workers. In addition to the monetary penalty, Land Enterprise agreed to work with EPA to develop a Pesticide Compliance Plan, to better protect and train their farm workers, and to improve their application methods to avoid future drift incidents.

EPA also took enforcement action at the non-tribal businesses. In one case, EPA settled with a company,

JSH Farms, for a penalty of \$1,344 for using a restricted pesticide without proper equipment and allowing pesticide drift onto adjacent property and onto the property owner. In the second case, Ag-Air was assessed a penalty of \$3,120 for spraying the restricted-use pesticide Warrior on grapes, which is not allowed.

In another action, Region 10's Air Program had issued a Notice of Noncompliance in October 2003 to Yakama Forest Products (YFP), a tribally owned and operated saw mill, for failing to comply with the Clean Air Act New Source Performance Standards for its boilers and fuel tanks. The mill also had failed to pay air emission fees and submitted an incomplete air permit application.

EPA actions such as these will help ensure the protection of people and resources within and around the Yakama Reservation.

115 Water Quality Monitoring Programs Completed in Indian Country

A great new tool is being used in Region 10 to help ensure that clean, safe drinking water is provided to every household. With an EPA Grant to the Small Utility Service Corporation, 115 Water Quality Monitoring Programs were completed this year. These 30- to 50-page documents summarize the features, treatment, source, and characteristics of each EPA-regulated drinking water system located in Indian Country. They also include detailed sampling plans for all monitoring required by the Safe Drinking Water Act. Once the sampling plan is approved by the Tribe, laminated enlargements of important features are developed and delivered to each water system. The

blow-ups help each system monitor according to its sampling plan, maintain its disinfection system, set other injection pumps, and related



functions. These laminated summaries can be pinned to the pump-house wall at each water system to provide a ready source of important information and help the water operator properly operate and maintain the system.

WORKING EFFECTIVELY WITH TRIBES continued

Compliance Assurance in Indian Country

Region 10's direct actions in Indian Country in FY05 included compliance assistance and assurance activities in all media programs, with an emphasis on tribal drinking water systems, solid waste management facilities, and tribal schools. EPA awarded a \$200,000 grant for a solid waste demonstration project in Alaska that will improve or enhance waste practices in Alaskan Native villages, and a \$135,000 grant to Region 10's Tribal Solid Waste Advisory Network. The latter grant funds a circuit rider to help tribes develop integrated waste-management plans and implement waste programs.

To enhance environmental health at tribal schools, the Region's Office of Compliance and Enforcement

(OCE) provided compliance assistance notebooks to all 11 Bureau of Indian Affairs (BIA) schools and conducted site visits at two of the schools. These visits help to ensure a healthy school environment for students by assessing a school's compliance with environmental laws and resolving all noncompliance issues. Future efforts will expand the universe of tribal schools addressed to include non-BIA schools in Indian Country and tribal schools in Alaska.



Tribal Health Clinic Initiative

EPA nationally has identified hospitals and health care facilities as a priority area. The *Healthy Hospitals for the Environment* program was instituted to encourage hospitals and clinics to go beyond simple compliance and commit to a pollution prevention approach to environmental management. At the same time, the Washington State Department of Ecology has initiated a focus on health care facilities and is coordinating with EPA. Ecology will conduct inspections and compliance assistance visits at these facilities outside of Indian Country, and EPA will conduct visits at facilities inside Indian Country.

Region 10 identified 55 Indian Health Service and tribally operated health care facilities in the region. EPA's goal is to conduct site visits at as many of these as possible during FY06. In FY05, six facilities were visited: those located on the Colville.

Tulalip, and Yakama reservations. The Agency inspected the dental clinics, pharmacies, x-ray departments, labs and maintenance operations.

All of the locations visited were generating relatively small amounts of regulated waste. The most common problems occurred in the dental clinics, with the mismanagement of x-ray photographic fluids and mercury-bearing dental amalgam. Although the facilities did have some programs in place, all but one were not meeting the standards for managing these wastes. EPA notified those not in compliance and provided information about proper management of dental wastes. In FY06 EPA will continue visiting health care facilities in Indian Country to be sure that wastes and other environmental issues are being managed properly.

ECONOMIC BENEFIT

Emphasis on Eliminating Economic Benefit of Non-compliance

During FY05, Region 10 continued to focus on the importance of recouping any economic benefit resulting from non-compliance with state and local agency programs. Economic benefit has been defined as a combination of the delayed and/or avoided costs associated with environmental compliance, and any illegal competitive advantage associated with the non-compliance. One of Region 10's goals is to ensure that state and local agency actions enforcing federal standards meet this performance expectation. It is equally true for EPA when directly implementing federal laws.

EPA has applied several different tools to encourage states to more accurately quantify, assess and collect economic benefit. Region 10 sponsored training events that reached an estimated 100 state and local agency compliance staff members. Additional training is scheduled for FY06 in Oregon. Periodic discussions related to grants and performance partnership agreements have helped EPA management reinforce the need to quantify, assess and recover economic benefit. EPA's oversight discussions with the state and local agencies have emphasized evaluating each federally reportable violation to determine if economic benefit resulted





from significant violations. Based on anecdotal evidence, the Region believes that several agencies have achieved marked improvements in quantifying and collecting economic benefit as a result of EPA guidance.

A basic element of EPA's administrative and civil enforcement policies is recouping the economic benefit of non-compliance in penalty actions. Specifically, it is "Agency policy that penalties generally should, at a minimum, remove any significant economic benefits resulting from failure to comply with the law." This policy is incorporated into the various, media-specific penalty policies, for example, the Clean Air Act (CAA) Stationary Source Civil Penalty Policy.

Two recent program reviews have included an evaluation of the recovery of economic benefit. The CAA program reviews have taken place over a number of years with one state being reviewed each year. The most recent compliance program review was conducted in 2004 for the State of Alaska. In June 2005, Region 10 released a review of the RCRA compliance programs in all four states for fiscal years 2000-2002. For a full text version of the review, see this Web page: http://yosemite.epa.gov/R10/OWCM.NSF/ed6c817875102d2d8825650f00714a59/cce81107a83d0609882570370069c3c6/\$FILE/Region10_RCRA_states_program_review_final.pdf.

CRIMINAL CASE HIGHLIGHTS

Million-dollar Restitution in Japanese Auto Wrecking Case

Flagrant disregard for environmental laws resulted in a prison sentence and a one million dollar restitution judgment against Wei Guo Huang (a.k.a. "Larry Huang"), doing business as Japanese Auto Wrecking and Japanese Auto Sales in Seattle, Washington. The case involved multiple violations.

On December 14, 2004, Huang was arrested and charged with the crimes of Illegal Hazardous Waste Disposal, Failure to Respond to Release of Used Oil, Failure to Respond to Spill or Discharge of Hazardous Waste, Improper Storage of Used Oil, and Wrecking Motor Vehicles Without a License. After being released on bail, Huang moved his operation to another location. Based on interviews and statements, the Seattle Police Department and EPA Criminal Investigation Division (CID) executed a second search warrant on April 7, 2005. Huang was again arrested for operating an illegal wrecking yard and posted a \$50,000 bond to secure his release. Huang, who was already on bail for the earlier charges, had violated one of his bail conditions when he engaged in the auto wrecking business.

On April 11, 2005, King County (Washington) Superior Court Judge Julie Spector accused Huang of "thumbing your nose at the court" and revoked his prior bail. An amended 14-count indictment was filed in the Superior Court of Washington for King County on October 10, 2005, where Huang was charged with seven felonies and seven misdemeanors. Huang, who was still incarcerated, entered into a plea agreement on October 17. He pleaded guilty to four felonies and four misdemeanors.

On November 4, 2005, Huang was sentenced to 35 months in prison and five years probation. He will also pay \$300,000 to EPA and \$700,000 to the property owner for cleanup costs. This was the first instance of charging knowing endangerment to a person under Washington law.

This case was investigated by the Washington Department of Ecology, the Washington State Patrol, the Seattle Police Department, the EPA CID Seattle Area Office, and EPA Region 10.

Portland Lead-Based Paint Case

Violating federal law and making false statements to federal agents led to five years of conditional probation for Long Dang Bui ("Bui"). As the lessor of properties built before 1978, Bui was legally required to give potential tenants—before they signed a lease—a federally approved warning about the health risks associated with lead-based paint. On April 5, 2005, Bui pleaded guilty in U.S. District Court in Portland, Oregon, to making false statements to EPA and HUD (Housing and Urban Development) agents during their investigation of his failure to provide that notification to a some of his tenants.

As an owner, lessor and manager of residential properties, Bui was required to provide notice of known lead-based paint hazards that might be present. During an EPA investigation in July 2003, Bui knowingly and willfully lied to investigators about lead-disclosure forms.

On June 27, 2005, Bui was sentenced to five years probation by the U.S, District Court in Portland. During

his probation, Bui is required to: 1) provide a Lead Paint Disclosure Form and lead-hazard pamphlet to all of his current tenants and post both documents in all the residences he owns, controls or manages; 2) submit a statement to the U.S. Probation Office disclosing all rental properties he owns, controls, or manages; 3) submit a list of tenants to EPA every year, along with a copy of each tenant's signed lead-disclosure statement; and 4) provide EPA with a list of all prior tenants who lived in his buildings since September 1996, so they can be notified of their potential exposure to lead-based paint.

This was the first such case prosecuted in the Northwest. It was investigated by EPA's Criminal Investigation Division, the Region 10 Oregon Operations Office and HUD. The Portland Police Bureau also assisted.

OCE IMPROVEMENTS

Better Management of Tips and Complaints

Tips and complaints from the public about potential environmental problems help EPA fulfill its mission to protect public health and the environment. To ensure that each tip or complaint is quickly followed up by EPA staff or referred to another agency with authority, Region 10 designed a database to track each one received. The new system was unveiled late in 2005 and now provides efficient and accurate routing of each and every complaint for follow-up. Anyone

reporting incidents of concern to the Region 10 office can be assured that the information will be directed to the right place and a response will be completed. Also, EPA can use the data to observe trends.

FEDERAL FACILITIES

Environmental Management System Three-Year Training Effort

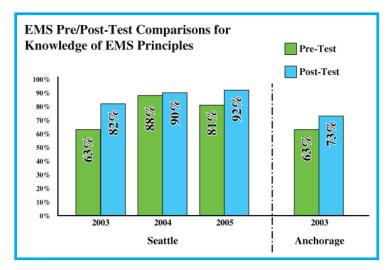
In April 2005, EPA completed a three-year effort to provide training to federal agencies on how to develop an Environmental Management System (EMS). An Executive Order called "Greening the Government through Environmental Leadership" required each federal agency to implement an EMS at all appropriate facilities by December 31, 2005.

An EMS is a continual cycle of planning, carrying out, reviewing and improving the processes that an organization uses to meet its business and environmental goals. Most EMSs are built on the "Plan, Do, Check, Act" model. The EMS includes the facility's

commitment to compliance with all federal, state and local environmental laws, to pollution prevention, and to continual improvement. As a result of this training, over 108 federal environmental managers and staff members from 17 federal agencies were provided with information and tools to help them create an EMS to fit their facility.

Before and after survey tests were conducted at each training session to determine the effectiveness of the information and resources provided. The chart below shows the results of this three-year effort in Region 10. Overall results demonstrate that attendees

improved their understanding considerably. This increased understanding should improve the ability of continually well-managed Federal Facilities to comply with environmental regulations. This is important both within the bounds of their facilities and for the surrounding communities.



[EPA did not hold another class in Anchorage after FY03 due to low registration in FY04.]