

**USE OF NATIONAL ACTION TYPES**

This guidance provides the AFS user with instructions for data entry of Clean Air Act program activity in the Air Facility System (AFS). Required data entry is outlined in the Summary of National Minimum Data Requirements (MDRs) for Clean Air Act Stationary Source Compliance, a document contained in the Information Collection Request (ICR) approved by the Office of Management and Budget (<http://www.epa.gov/icr/icrs/icrpages/0107ss07.PDF>).

Activities are reported to AFS via an Action Record (Screen 306/507) and contain the following components (Note that required fields are highlighted by **BOLD** text):

**KEY ACTION (YES OR NO)**

**AIR PROGRAM CODE(S)**

**ACTION TYPE**

DATE SCHEDULED

**DATE ACHIEVED**

RESULTS CODE AS APPLICABLE

PENALTY AMOUNT AS APPLICABLE

RDE8 AS APPLICABLE

STAFF CODE

POLLUTANT CODE AS APPLICABLE

CONTRACTOR ID OPTIONAL

RDE 16 OPTIONAL

KEY ACTION: This field defaults to a NO value. Direct users of AFS must indicate a “Y” for YES value if the action is the key for an High Priority Violator (HPV) or Non-HPV pathway. Batch users of AFS trigger this value by supplying the Key Action Number on the action transaction. Identification of a key action is mandatory for action linking in HPV or Non-HPV pathways.

AIR PROGRAM CODE(S): Any applicable air program for a reported activity should be listed on the action record. AFS will not accept an air program code that has not been documented in Screens 302/502. Users should not enter only one air program if more programs are applicable.

ACTION TYPE: This field is the Regional Action Type identifying the activity. Each EPA Region has its own action type table, with values mapping into the National Action Type tables. Users do not report activity using a National Action Type. The 2-digit Action Type is predefined in an action table. AFS will not accept a value which is not on record in the table. Also available is the special code of “00” used in instances where the action table does not have a valid value for use, and is not expected to become a recurring activity. For example: A source with an active High Priority Violator (HPV) pathway suffers a fire, destroying most of the source. As this activity is important to the HPV information, an AFS user may want to include this information in

the HPV pathway. There is no action type in the Regional table describing a fire. The user can report the fire using action type “00” with a mandatory description of “Fire”. Use of action type “00” requires the entry of a short description of the action. The Regional AFS Compliance Manager should be contacted for addition of action types to the Regional table.

**DATE SCHEDULED:** AFS provides space for reporting the scheduled date of an activity. This field is optional reporting for most activities but can be required in Compliance Monitoring Strategy (CMS) reporting. The reporting parameter is YYMMDD, with YY representing the last two digits of a year (example: 2003 is reported as 03), MM as the 2-digit month (example: June is reported as 06), and DD as the day of the month. Date Scheduled is an Enforcement Sensitive field. Either the Date Scheduled or Date Achieved is mandatory for action reporting.

**DATE ACHIEVED:** This field is most frequently reported of date fields, and reflects the final date of an activity. Please see discussions of individual action types for the definition of Date Achieved. The reporting parameter is YYMMDD, with YY representing the last two digits of a year (example: 2003 is reported as 03), MM as the 2-digit month (example: June is reported as 06), and DD as the day of the month. Either the Date Scheduled or Date Achieved is mandatory for action reporting.

**RESULTS CODE:** A two-digit alphanumeric code used to indicate the result of an activity. The code must be a valid value on the Results Table. Each Region maintains its own Results Code Table. This field is optional for most activity, but mandatory for Stack Test and Annual Compliance Certification Reviewed reporting.

**PENALTY AMOUNT:** This field reports dollar amounts of penalties. In formal enforcement actions, it defines the dollar amount of any cash penalty that is either 1) assessed (required) by an administrative order, consent agreement/order, or consent decree; or 2) proposed under a civil referral or civil filing. In Supplemental Environmental Projects, the penalty field reports the dollar value of the project. Penalties exceeding the seven-digit limit of the PAM1 field in AFS can be reported by entering the alpha K after the value of thousands of dollars.

**REGIONAL DATA ELEMENT 8 (RDE 8):** This 2-digit field is optional for most activities, but required in Annual Compliance Certification reporting. It is defined by users and used to maintain information relating to a plant action.

**STAFF CODE:** A 2-digit code identifying a staff member responsible for or associated with an action. This code must be a valid value on the Staff Code table. Entry of values on the Staff Code table requires a special access code on the user’s security profile. Use of the Staff Code field is optional to all users.

**POLLUTANT CODE:** A five-digit code identifying the pollutant of record for an action. Reporting of the pollutant code is mandatory for HPV Key Actions. Pollutant code may be

reported on stack test actions.

CONTRACTOR ID: Use of this field is optional. The Contractor ID is a 12-digit alphanumeric field used to identify asbestos contractors. The ID must be a valid value from the Contractor ID Table. This field is considered obsolete.

REGIONAL DATA ELEMENT 16 (RDE 16): This 25-digit optional field is defined by users and used to maintain information relating to plant level actions.

The National Action Types identified in this guidance are:

FULL COMPLIANCE EVALUATIONS  
PARTIAL COMPLIANCE EVALUATIONS  
STACK TESTS  
INVESTIGATIONS  
NOTICE OF VIOLATION  
ADMINISTRATIVE ORDER  
COURT CONSENT DECREES  
CONSENT AGREEMENTS/ORDERS  
CIVIL REFERRALS  
CIVIL ACTIONS  
HPV DAY ZERO  
HPV ADDRESSING ACTIONS  
HPV RESOLVING ACTIONS  
TITLE V ANNUAL COMPLIANCE CERTIFICATION RECEIVED  
TITLE V ANNUAL COMPLIANCE CERTIFICATION REVIEWED

**FULL COMPLIANCE EVALUATIONS (FCE)**

DEFINITION: (Extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001) A Full Compliance Evaluation is a comprehensive evaluation of the compliance status of a facility. It addresses all regulated pollutants at all regulated emission units. Furthermore, it addresses the current compliance status of each emission unit, as well as the facility’s continuing ability to maintain compliance at each emission unit.

A Full Compliance Evaluation should include the following:

- A review of all required reports, and to the extent necessary, the underlying records. This includes all monitored data reported to the regulatory agency (e.g., CEM and continuous parameter monitoring reports, malfunction reports, excess emission reports). It also includes a review of Title V self-certifications, semi-annual monitoring and periodic monitoring reports, and any other reports required by permit.
- An assessment of control device and process operating conditions as appropriate. An on-site visit to make this assessment may not be necessary based upon factors such as the availability of continuous emission and periodic monitoring data, compliance certifications, and deviation reports. Examples of source categories that may not require an on-site visit to access compliance include, but are not limited to, gas-fired compressor stations, boilers in large office and apartment buildings, peaking stations, and gas turbines.
- A visible emission observation as needed.
- A review of facility records and operating logs.
- An assessment of process parameters such as feed rates, raw material compositions, and process rates.
- An assessment of control equipment performance parameters (e.g., water flow rates, pressure drop, temperature, and electrostatic precipitator power levels).
- A stack test where there is no other means for determining compliance with the emission limits. In determining whether a stack test is necessary, States/locals should consider factors such as: size of emission unit; time elapsed since last stack test; results of that test and margin of compliance; condition of control equipment; and availability and results of associated monitoring.
- A Full Compliance Evaluation may be done piecemeal through a series of Partial Compliance Evaluations.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**REQUIRED REPORTING-RECAP**

No, not required

**Required, usually “V” for Title V and any other applicable air programs**

**FE EPA Conducted FCE On Site**

**FZ EPA FCE Off Site**

**FS State Conducted FCE On Site**

**AFS BUSINESS RULES**

**DRAFT–JUNE 24, 2003**

<b>DATE SCHEDULED:</b>	<b>FF State FCE Off Site</b>
<b>DATE ACHIEVED:</b>	Optional <b>Required, can reflect either the actual end date of the evaluation or the date of the evaluation report.</b>
<b>RESULTS CODE:</b>	Optional
<b>PENALTY AMOUNT:</b>	Not appropriate for this action type
<b>RDE8:</b>	Not required
<b>STAFF CODE:</b>	Not required
<b>POLLUTANT CODE:</b>	Not required
<b>CONTRACTOR ID</b>	Not required
<b>RDE 16</b>	Not required

**PARTIAL COMPLIANCE EVALUATIONS (PCE)**

DEFINITION: (Extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001) A Partial Compliance Evaluation is a documented compliance assessment focusing on a subset of regulated pollutants, regulatory requirements, or emission units at a given facility. A PCE should be more comprehensive than a cursory review of individual reports. It may be conducted solely for the purpose of evaluating a specific aspect of a facility, or combined over the course of a year to satisfy the requirements of a Full Compliance Evaluation. PCEs may include: Site Visits, Conferences, Review of Required Reports, Compliance Reviews of individual Air Programs, Emission Inventory reviews, or other activities.

AFS REPORTING:

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**OPTIONAL REPORTING**

No, not required

**Required, usually “V” for Title V and any other applicable air programs**

**ES EPA Conducted PCE On Site**

**EX EPA PCE Off Site**

**PS State Conducted PCE On Site**

**PX State PCE Off Site**

Optional

**Required, can reflect either a review date or actual date of visit.**

Optional

Not appropriate for this action type

Not required

Not required

Not required

Not required

Not required.

**STACK TESTS**

**DEFINITION:** An actual measurement of emissions at the point of release for regulated pollutants within a facility was conducted, using EPA approved reference methods. This action documents that a stack test was completed. Test results are reflected in the Results Codes (PP-PASS, FF-FAIL). The pollutant tested can be reported in the Pollutant Code field on the action record. Multiple actions on the same day with multiple pollutants are acceptable. There are multiple action types for Stack Tests. They are:

- 2A EPA Source Test Conducted: EPA test required, observed, and reviewed.
- 3A Owner/Operator Conducted Source Test: Must be State/Local agency observed and reviewed.
- 6C State Source Test Conducted: Must be State/Local agency observed and reviewed.
- TE EPA Required Stack Test Not Observed: Owner/Operator Conducted test, required by EPA, reviewed by EPA, but not observed by EPA
- TO EPA Required Stack Test Observed: EPA required stack test, Owner/Operator conducted, observed by EPA.
- TR State Required Stack Test Not Observed: Owner/Operator Conducted test, required by the State or Local Agency, reviewed but not observed by the State.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**REQUIRED REPORT–RECAP**

No, not required

**Required, usually “V” for Title V and any other applicable air programs**

**2A EPA Source Test Conducted**

**3A Owner/Operator-Conducted Source Test**

**6C State Source Test Conducted**

**TE EPA Stack Test Not Observed**

**TO EPA Stack Test Observed**

**TR State Stack Test Not Observed**

Optional

**Required. For Reviews: Date of review. For observed tests: last day of actual test.**

**Required: PP-PASS, FF-FAIL**

Not appropriate for this action type

Not required

Not required

Optional reporting, not required

Not required

Not required.

**INVESTIGATIONS**

DEFINITION: (Extracted from the Clean Air Act Stationary Source Compliance Monitoring Strategy, April 2001) An Investigation is limited to a portion of a facility, is more resource intensive, and involves a more in-depth assessment of a particular issue. It usually is based on information discovered during a Full Compliance Evaluation, or as the result of a targeted industry, regulatory, or statutory initiative. Also, an Investigation often requires the use and analysis of information not available in EPA data systems. It is best used when addressing issues that are difficult to evaluate during a routine FCE because of time constraints, the type of preliminary field work required, and/or the level of analytical expertise needed to determine compliance.

Investigations are tracked in AFS via two Action Types: Initiated and Completed. At the start of an Investigation, the action types documenting the initiated date should be added. At the completion of the Investigation (which could span fiscal year time frames), the action types documenting the completion date should be added.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect the applicable air programs**

**EI EPA Investigation Initiated**

**EC EPA Investigation Conducted**

**SI State Investigation Initiated**

**SC State Investigation Conducted**

Optional

**Required. Actual dates of investigation initiated and completion.**

Not required

Not appropriate for this action type

Not required

Not required

Optional reporting, not required

Not required

Not required.



**NOTICE OF VIOLATION**

DEFINITION: A notice of violation (NOV) sent by EPA or the State/Local Agency informing a source that a violation by the authority granted by Section 113 of the Clean Air Act as amended in 1990, or similar State authority for a violation of the Clean Air Act has occurred.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect the applicable air programs**

**6A EPA NOV Issued**

**7C State NOV Issued**

Optional

**Required. Signature date of the NOV letter.**

Not required

Not appropriate for this action type

Not required

Not required

Optional reporting, not required

Not required

Not required.

**ADMINISTRATIVE ORDERS**

**DEFINITION:** An administrative action (not civil or judicial) against a source with or without an assessed penalty that has been determined by the proper authority for violating the Clean Air Act as amended in 1990, or other State-delegated regulations. The penalty reported will be an assessed cash penalty.

EPA Administrative Penalty Orders (APOs) are a three-step reporting process starting with 7F-113(D) Administrative Penalty Order Filed, the Date Achieved reflecting the filing date of the action and the penalty reflecting the proposed penalty from the order. It is following by the second step, C2-113(D) Administrative Penalty Order Recalculated, which contains the mitigated assessed penalty amount. This second action (C2) documents the APO, and provides the record of formal and final penalty. The last activity, C3-APO Collected, documents when the assessed penalty is paid.

These action are addressing actions for High Priority Violator (HPV) tracking, and are to be used conjunction with action linking.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect the applicable air programs**

**Administrative Orders**

**8A EPA 113(A) Order Issued**

**8C State Administrative Order Issued**

**Federal APOs**

**7F EPA 113(D) Complaint Filed**

**C2 EPA 113(D) Recalculated**

**C3 EPA 113(D) Collected**

Optional

**Required. Date of the official instrument.**

Not required

**8A-Final Assessed Cash Penalty**

**8C-Final Assessed Cash Penalty**

**7F- Proposed Cash Penalty**

**C2-Final Assessed Cash Penalty**

**C3-Assessed Cash Penalty Paid**

Not required

Not required

Optional reporting, not required

Not required

Not required.

**^ CIVIL REFERRALS, CIVIL ACTIONS, AND CONSENT DECREES****DEFINITION:**

**Federal Civil Referral:** Action taken by EPA to file a civil complaint in Federal court pursuant to the authority granted under State law for violating applicable State regulations or State-delegated Federal regulations. Additionally, this action is to be used in the preparation of a litigation report to initiate a Federal civil action against a noncomplying source and submittal to Headquarters is imminent (to be counted here the litigation report must have the Regional Air Director approval). Penalties reported are the assessed dollar amount of any cash civil penalty. This is an addressing action for a high priority violation. This action is Enforcement Sensitive. If this action is used in a High Priority Violator case, action type OT is also required.

**AFS REPORTING:**

KEY ACTION (YES OR NO):

AIR PROGRAM CODE(S):

ACTION TYPE:

DATE SCHEDULED:

DATE ACHIEVED:

RESULTS CODE:

PENALTY AMOUNT:

RDE8:

STAFF CODE:

POLLUTANT CODE:

CONTRACTOR ID

RDE 16

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect the applicable air programs****4B EPA Civil Referral**

Optional

**Required. Signature date of litigation report.**

Not required

**Proposed Penalty**

Not required

Not required

Optional reporting, not required

Not required

Not required.

**State Civil Referral:** An action taken by the State or local agency against a source resulting in a civil complaint being sent to the State Attorney General. This is different from a State Civil Action (action type 9C) which is the actual filing of a civil complaint against a source by the State Attorney General in a State court. This action is an addressing action for high priority violations and is to be used in action linking. This action type is Enforcement Sensitive. If this action is used in a HPV case, action type OT is also required.

**AFS REPORTING:**

KEY ACTION (YES OR NO):

AIR PROGRAM CODE(S):

ACTION TYPE:

DATE SCHEDULED:

DATE ACHIEVED:

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect the applicable air programs****1E Civil Referral to State Attorney**

Optional

**Required. Signature date of referral document**

**AFS BUSINESS RULES**

**DRAFT–JUNE 24, 2003**

RESULTS CODE:	Not required
<b>PENALTY AMOUNT:</b>	<b>Proposed Cash Penalty</b>
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID	Not required
RDE 16	Not required.

State Civil Action: The filing of a civil complaint against a source by the State Attorney General in a State Court. Action is taken by a State or Local Agency to file a civil complaint against a source in the State Court pursuant to the authority granted under State Law for violating applicable SIP or State delegated Federal regulations. This action is an addressing action for high priority violations and is to be used in action linking.

<b><u>AFS REPORTING:</u></b>	<b>REQUIRED REPORTING–RECAP</b>
KEY ACTION (YES OR NO):	No, not required
<b>AIR PROGRAM CODE(S):</b>	<b>Required, should reflect the applicable air programs</b>
<b>ACTION TYPE:</b>	<b>9C State Civil Action</b>
DATE SCHEDULED:	Optional
<b>DATE ACHIEVED:</b>	<b>Required. Date of Court filing</b>
RESULTS CODE:	Not required
<b>PENALTY AMOUNT:</b>	<b>Assessed Cash Penalty</b>
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID	Not required
RDE 16	Not required.

Federal Civil Action: WORK IN PROGRESS

Consent Decree: A decree signed by the primary enforcement authority, the source, and by the court requiring a source violating an applicable Federal or SIP regulation to attain compliance by means specified in the decree. Consent Decrees and consent agreements should be tracked here if they are formally signed. This is an addressing action for a high priority violator. Penalties reported are the assessed dollar amount of any cash civil penalty. This action is also used for Administrative Consent Decrees.

<b><u>AFS REPORTING:</u></b>	<b>REQUIRED REPORTING–RECAP</b>
KEY ACTION (YES OR NO):	No, not required
<b>AIR PROGRAM CODE(S):</b>	<b>Required, should reflect the applicable air programs</b>

**AFS BUSINESS RULES**

**DRAFT–JUNE 24, 2003**

<b>ACTION TYPE:</b>	<b>6B EPA Court Consent Decree</b> <b>2B State Court Consent Decree</b>
DATE SCHEDULED:	Optional
<b>DATE ACHIEVED:</b>	<b>Required. Date of Decree</b>
RESULTS CODE:	Not required
<b>PENALTY AMOUNT:</b>	<b>Assessed Cash Penalty</b>
RDE8:	Not required
STAFF CODE:	Not required
POLLUTANT CODE:	Optional reporting, not required
CONTRACTOR ID	Not required
RDE 16	Not required.

**HIGH PRIORITY VIOLATOR (HPV) DAY ZERO**

DEFINITION: A High Priority Violator (HPV) is identified one of three ways:

1. The violation may fit within one of the ten General HPV Criteria identified in the HPV Policy of June 1999.
2. The violation may lead to emissions or parameter violations that fit within the HPV Matrix Criteria (reference the HPV Policy of June 1999).
3. The violation may be categorized as an HPV on a discretionary basis subject to the mutual agreement of the State/Local agency and EPA.

HPV cases are tracked in AFS in three distinct milestones: Day Zero, Addressing Action, and Resolving Action. Each of these milestones has reporting criteria and the reporter must link all appropriate actions to the Day Zero action in AFS.

DAY ZERO DEFINITION: Day Zero will ordinarily be no later than 45 days from the day the violation was discovered. For violations requiring additional information, Day Zero may be extended to 90 days from the date the violation is discovered or the date of receipt of the additional information. If a violation is self-reported, Day Zero will be 30 days from the date the agency receives the information. A Notice of Violation action usually documents the Day Zero action. In addition to reporting the Day Zero and action linking, the plant compliance status should be changed to reflect violation.

**AFS REPORTING:**  
**KEY ACTION (YES OR NO):**  
**AIR PROGRAM CODE(S):**

**REQUIRED REPORTING–RECAP**  
**YES**  
**Required, should reflect the applicable air programs**

**ACTION TYPE:**

**2Z EPA Day Zero**  
**2E State Day Zero**  
**2U Enforcement Lead is Unassigned**  
**2B Shared Enforcement Lead**

**DATE SCHEDULED:**

Optional

**DATE ACHIEVED:**

**Required. Date determined by policy.**

**RESULTS CODE:**

Not required

**PENALTY AMOUNT:**

Not appropriate for this action type

**RDE8:**

Not required

**STAFF CODE:**

Not required

**POLLUTANT CODE:**

**Required, lead pollutant should be reported.**

**CONTRACTOR ID**

Not required

**RDE 16**

Not required.

**NOTE: ACTION LINKING IS REQUIRED**

NOTE: Users are encouraged to enter a short comment describing the violation on the Day Zero

key action.

**LEAD CHANGES DEFINITION:** Lead changes (From Federal to State lead, from State to Federal Lead, or Joint Lead) on a violation may be made at any time. Timely and appropriate enforcement is extended to 300 days in case of a lead change. Cases may be assumed by EPA if addressing/resolution actions have not taken place by Day 270.

**AFS REPORTING:**

**REQUIRED REPORTING–RECAP**

**KEY ACTION (YES OR NO):**

No, not required

**AIR PROGRAM CODE(S):**

**Required, should reflect the applicable air programs**

**ACTION TYPE:**

**DY Lead Changed to Federal Enforcement  
DB Lead Changed to Shared Enforcement  
DS Lead Changed to State Enforcement**

**DATE SCHEDULED:**

Optional

**DATE ACHIEVED:**

**Required. Date of the Lead Change.**

**RESULTS CODE:**

Not required

**PENALTY AMOUNT:**

Not appropriate for this action type

**RDE8:**

Not required

**STAFF CODE:**

Not required

**POLLUTANT CODE:**

Not required

**CONTRACTOR ID**

Not required

**RDE 16**

Not required.

**ADDRESSING ACTION DEFINITION:** By Day 270 (if there has been no lead change), the violation should be either Resolved or Addressed. There should be an administrative or judicial order in place for compliance purposes, or the case should be subject to referral for an enforcement hearing or judicial action. In the case of a civil referral, an additional action of OT-Other Addressing Action will need to be entered and linked to the Day Zero. As the Civil Referral action is Enforcement Sensitive, the OT action will ensure that the violation is correctly addressed in extracts to systems like the Online Targeting Information System (OTIS) and the Enforcement Compliance History Online (ECHO) system.

**VIOLATION RESOLVED DEFINITION:** Source compliance is confirmed, all penalties are collected, all injunctive relief completed. After action reporting and linking, compliance status should be returned to compliance.

<b>NATIONAL ACTION TYPES FOR ADDRESSING OR RESOLVING HIGH PRIORITY VIOLATOR CASES IN AFS</b>			
<b>ACT TYPE</b>	<b>DESCRIPTION</b>	<b>ADDRESS</b>	<b>RESOLVE</b>
C3	113(D) ADMIN PENALTY COLLECTED		X
C7	CLOSEOUT MEMO ISSUED		X
OT	OTHER ADDRESSING ACTION (USED IN CONJUNCTION WITH CIVIL REFERRALS)	X	
VR	VIOLATION RESOLVED		X
WD	113(D) WITHDRAWN		X
1D	CRIMINAL REFERRAL	X	
2D	STATE COURT CONSENT DECREE	X	
2K	COMPL BY STATE, NO ACTION REQUIRED	X	
2L	PROPOSED SIP REVISION WILL LEAD TO COMPLIANCE	X	
2M	PROPOSED SIP/FIP REVISION WILL LEAD TO COMPLIANCE	X	
4B	EPA CIVIL REFERRAL	X	
5B	EPA CRIMINAL ACTION	X	X
6B	EPA COURT CONSENT DECREE	X	
7A	EPA NOTICE OF NONCOMPLIANCE (OBSOLETE)	X	
7E	EPA 167 ORDER (OBSOLETE)	X	
7F	EPA 113(D) APO COMPLAINT FILED	X	
7F	COMPL BY EPA, NO ACTION REQUIRED	X	
8A	EPA 113(A) ORDER ISSUED	X	
8C	STATE ADMIN ORDER ISSUED	X	
9C	STATE CIVIL ACTION	X	



**AFS REPORTING FOR ADDRESSING**

**AND RESOLVING ACTIONS:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**NOTE: ACTION LINKING IS REQUIRED**

NOTE: Users are encouraged to enter a short comment describing the addressing/resolving action on the Day Zero key action.

**REQUIRED REPORTING–RECAP**

**NO**

**Required, should reflect the applicable air programs**

**See Chart Above**

**Optional**

**Required. Date determined by activity.**

**Not required**

**Assessed cash penalties**

**Not required**

**Not required**

**Required on Day Zero action, optional for addressing and resolving action**

**Not required**

**Not required.**

**TITLE V ANNUAL COMPLIANCE CERTIFICATIONS DATE DUE AND RECEIVED**

DEFINITION: As required by the Compliance Monitoring Strategy (CMS) of April 2001, Regions shall enter the date a Title V Annual Compliance Certification (ACC) is due and received unless otherwise negotiated. Due Dates are normally determined by the Permit Authority and may reflect a grace period before a source is considered to be late in submitting the ACC. Received dates are the post mark dates on the ACC. In case of electronic submission, the date received is the date submitted to the reviewing agency.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

**RDE 16**

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect “V” Title Vair programs**

**CC EPA TV ACC Due/Received**

**CB Permit Authority TV ACC Due/Received**

**(As negotiated)**

**Due Date, determined by Permitting Authority**

**Received date, should reflect the post mark on the certification.**

Not required

Not appropriate for this action type

Not required

Not required

Optional reporting, not required

Not required

Not required.

**TITLE V ANNUAL COMPLIANCE CERTIFICATION REVIEWS**

**DEFINITION:** As required by the Compliance Monitoring Strategy (CMS) of April 2001, EPA or State/Local Agency review of an annual compliance certification submitted by a source which is permitted under Title V of the Clean Air Act as amended in 1990. Compliance status is to be reported in the Results Code field: MC-In Compliance, MV-In Violation, MU-Compliance Status Unknown. Deviations are to be reported by EPA in the RDE8 field: Y-Yes, N-No, or a number of deviations reported may be entered.

**AFS REPORTING:**

**KEY ACTION (YES OR NO):**

**AIR PROGRAM CODE(S):**

**ACTION TYPE:**

**DATE SCHEDULED:**

**DATE ACHIEVED:**

**RESULTS CODE:**

**PENALTY AMOUNT:**

**RDE8:**

**STAFF CODE:**

**POLLUTANT CODE:**

**CONTRACTOR ID**

RDE 16

**REQUIRED REPORTING–RECAP**

No, not required

**Required, should reflect “V” Title Vair programs**

**ER Compliance Certification EPA Review**

**SR Compliance Certification State Review**

Not Required

**Reviewed date, should reflect the date the review was completed.**

**Compliance Status: MC-In Compliance, MV-In**

**Violation, MU-Compliance Status Unknown**

Not appropriate for this action type

**Required for EPA Entry: Y-Yes, N-No, or a number of deviations may be reported**

Not required

Optional reporting, not required

Not required

Not required.