



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 6  
1201 ELM STREET, SUITE 500  
DALLAS, TEXAS 75270

November 14, 2024

Ms. Demetria Kimbrough  
Associate Director  
Office of Air Quality  
Arkansas Energy & Environment - Environmental Quality  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

Dear Ms. Kimbrough:

The Quality Assurance Project Plan (QAPP) for the Arkansas Department Energy & Environment/Division of Environmental Quality (ADE&E/DiEQ) titled Quality Assurance Project Plan (QAPP) for Compliance and Enforcement Data Management Office of Air Quality, Q-Trak No. 25-053. I am pleased to inform you that the QAPP has been reviewed and approved by Diana Lundelius, Environmental Protection Specialist, Region 6, EPA. The QAPP has an expiration date of November 14, 2026.

Please send all QAPP's **sixty days prior to** the expiration of the recipient's approved QAPP. The recipient shall submit to the Project Officer a revised QAPP or certification that the QAPP is current and include a signed copy of the new approval page(s) for the QAPP.

Digitally signed copy of the QAPP signature page(s) are attached for your record. Should you have any questions, please call me at (214) 665-8453.

Sincerely,

A handwritten signature in blue ink that reads "Terrie Wright".

Terrie Wright  
Project Officer  
Air Grants Section



**DIVISION OF  
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders  
GOVERNOR

Shane E. Khoury  
SECRETARY

October 24, 2024

Ms. Terrie L. Wright  
Environmental Protection Specialist (6AR-PM)  
U.S. Environmental Protection Agency, Region 6  
1201 Elm St., Suite 500  
Dallas, TX 75270

Dear Terrie L. Wright:

The Arkansas Department of Energy and Environment, Division of Environmental Quality (AR DEQ) is requesting an approval extension for the previously approved Arkansas Integrated Compliance Information System (ICIS) Quality Assurance Project Plan. This plan initially expired in July 2024 with an extension approved until November 1, 2024 (Q-Trak No. 22-397).

If possible, please extend the approval for three years since no major changes are anticipated during the requested timeframe. If changes are made, the QAPP will be updated to reflect those changes and submitted to Region VI. Upon review of this request, please provide AR DEQ with documentation of your approval or denial.

Signature sheet and updated organizational chart are enclosed. If you have any questions, please do not hesitate to contact Heinz Braun at 501-682-0756, or via e-mail at [Heinz.Braun@arkansas.gov](mailto:Heinz.Braun@arkansas.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Stacie Wassell".

Stacie Wassell  
AR DEQ Interim QA Manager

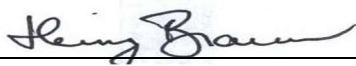
A handwritten signature in black ink, appearing to read "Heinz Braun".

Heinz Braun  
AR DEQ Project Manager  
Office of Air Quality


**QUALITY ASSURANCE PROJECT PLAN**  
**Compliance and Enforcement ICIS Data Management**  
**Office of Air Quality**

Prepared by  
Arkansas Department of Energy and Environment  
5301 Northshore Drive  
North Little Rock, AR 72118


Prepared for  
United States Environmental Protection Agency Region 6  
1201 Elm Street, Suite 500  
Dallas, Texas 75270

  
\_\_\_\_\_  
Heinz Braun, Project Manager  
Office of Air Quality

Date: 10.21.2024  
Email: [Heinz.Braun@arkansas.gov](mailto:Heinz.Braun@arkansas.gov)  
Phone: (501) 682-0756

  
\_\_\_\_\_  
Heath Cobb, Deputy Associate Director  
Office of Air Quality


Date: 10/24/2024  
Email: [Heath.Cobb@arkansas.gov](mailto:Heath.Cobb@arkansas.gov)  
Phone: (501) 682-0711

  
\_\_\_\_\_  
Rhonda Moore, Quality Assurance Coordinator  
Office of Air Quality

Date: 10/24/24  
Email: [Rhonda.Moore@arkansas.gov](mailto:Rhonda.Moore@arkansas.gov)  
Phone: (501) 682-0795

  
\_\_\_\_\_  
Stacie Wassell, Interim Quality Assurance Manager  
Office of Water Quality

Date: 22 October 2024  
Email: [Stacie.Wassell@arkansas.gov](mailto:Stacie.Wassell@arkansas.gov)  
Phone: (501) 682-0886

  
\_\_\_\_\_  
Demetria Kimbrough, Associate Director  
Office of Air Quality

Date: 10.21.24  
Email: [Demetria.Kimbrough@arkansas.gov](mailto:Demetria.Kimbrough@arkansas.gov)  
Phone: (501) 682-0067

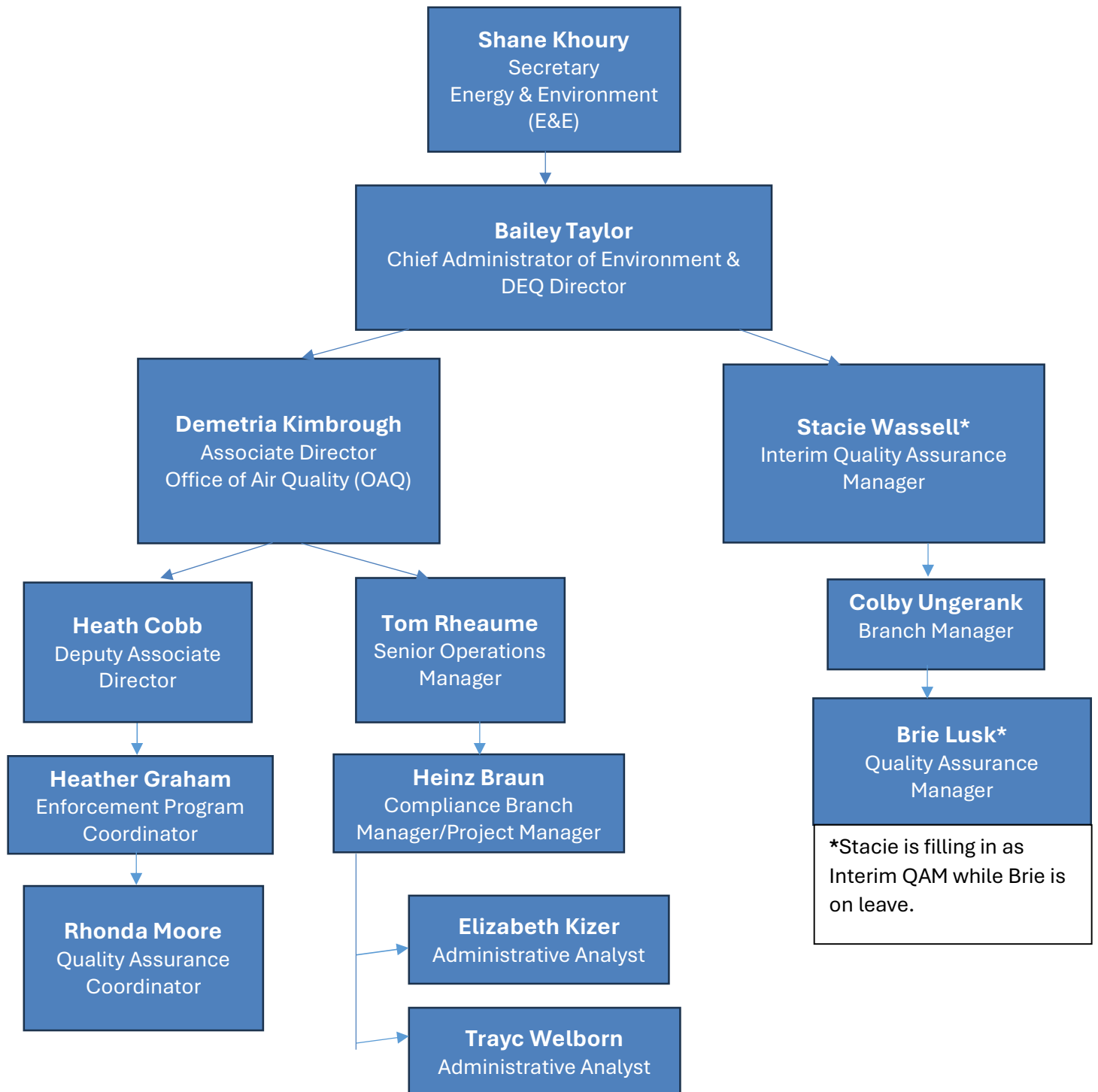
\_\_\_\_\_  
Quality Assurance Coordinator, EPA Region 6

Date: \_\_\_\_\_

\_\_\_\_\_  
Grants Project Officer, EPA Region 6

Date: \_\_\_\_\_

DEQ, Office of Air Quality  
Compliance & Enforcement  
ICIS QAPP Organizational Chart



**Quality Assurance Project Plan  
for  
Compliance and Enforcement Data Management  
Office of Air Quality**

**Prepared by  
Arkansas Department of Energy and Environment,  
Division of Environmental Quality**

**Prepared for  
United States Environmental Protection Agency Region 6**

Approvals Signature:

  
\_\_\_\_\_  
Quality Assurance Manager      Date: 6/22/22

  
\_\_\_\_\_  
Quality Assurance Coordinator      Date: 6/21/22

  
\_\_\_\_\_  
Project Manager      Date: 6/21/22

\_\_\_\_\_  
EPA Project Manager/Officer      Date: \_\_\_\_\_

\_\_\_\_\_  
EPA QA Manager/Representative      Date: \_\_\_\_\_

## **Table of Contents**

<b><u>Section</u></b>	<b><u>Page</u></b>
<b>1.0 PROJECT MANAGEMENT</b>	<b>4</b>
1.1 Title and Approval Page	4
1.2 Table of Contents	4
1.3 Distribution List	4
1.4 Project Organization	6
1.5 Problem Definition/Background	9
1.6 Project/Task Description and Schedule	9
1.7 Quality Objectives and Criteria for Measurement Data	10
1.7.1 Objectives and Project Decisions	11
1.7.2 Action Limits/Levels	11
1.7.3 Measurement Performance Criteria/Acceptance Criteria	11
1.8 Special Training Requirements/Certification	12
1.9 Documents and Records	12
1.9.1 QA Project Plan Distribution	12
1.9.2 Field Documentation and Records	12
1.9.3 Laboratory Documentation and Records	12
1.9.4 Quarterly and/or Final Reports	12
<b>2.0 DATA GENERATION AND ACQUISITION</b>	<b>14</b>
2.1 Sampling Design (Experimental Design)	14
2.2 Sampling Methods	14
2.3 Sample Handling and Custody	14
2.4 Analytical Methods	14
2.4.1 Field Measurements Methods	14
2.4.2 Field Analyses Methods	14
2.4.3 Laboratory Analyses Methods (Off-Site)	14
2.5 Quality Control Requirements	14
2.5.1 Field Sampling Quality Control	14
2.5.2 Field Measurement/Analysis Quality Control	14
2.5.3 Laboratory Analysis Quality Control	14
2.6 Instrument/Equipment Testing, Inspection, and Maintenance	14
2.6.1 Field Measurement Instruments/Equipment	15
2.6.2 Field Instruments/Equipment (Screening and Definitive)	15
2.6.3 Laboratory Analysis Instruments/Equipment (Off-Site)	15
2.7 Instrument/Equipment Calibration and Frequency	15
2.7.1 Field Measurement Instruments/Equipment	15
2.7.2 Field Instruments/Equipment (Screening and Definitive)	15
2.7.3 Laboratory Analysis Instruments/Equipment (Off-Site)	15
2.8 Inspection/Acceptance Requirements for Supplies and Consumables	15
2.8.1 Field Sampling Supplies and Consumables	15

2.8.2 Field Measurement/Analyses (Screening and Definitive) Supplies and Consumables .....	15
2.8.3 Laboratory Analyses (Off-Site) Supplies and Consumables.....	15
2.9 Data Acquisition Requirements (Non-Direct Measurements) .....	15
2.10 Data Management .....	16
2.10.1 Inspection Data Acquisition.....	16
2.10.2 Other Compliance Data Acquisition.....	16
2.10.3 Enforcement Data Acquisition.....	17
2.10.4 Permit Data Acquisition.....	17
3.0 ASSESSMENT AND OVERSIGHT .....	18
3.1 Assessments/Oversight and Response Actions.....	18
3.2 Reports to Management .....	18
4.0 DATA REVIEW AND USABILITY.....	18
4.1 Data Review, Verification, and Validation Requirements.....	18
4.2 Verification and Validation Methods.....	18
4.3 Reconciliation with User Requirements .....	18
5.0 REFERENCES .....	19

## **1.0 PROJECT MANAGEMENT**

**1.1 Title and Approval Page** (EPA QA/R-5 A1) - See page 1.

**1.2 Table of Contents** (EPA QA/R-5 A2) - See pages 2–4.

**1.3 Distribution List** (EPA QA/R-5 A3)

Name: Jonathan Westmoreland  
Title: Quality Assurance Manager (QAM)  
Organization: Arkansas Department of Energy and Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0941  
[j.westmoreland@adeq.state.ar.us](mailto:j.westmoreland@adeq.state.ar.us)

Name: Tricia Treece  
Title: Deputy Associate Director and Quality Assurance Coordinator (QAC)  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0055  
[treecep@adeq.state.ar.us](mailto:treecep@adeq.state.ar.us)

Name: Heinz Braun  
Title: Compliance Branch Manager and Project Manager (PM)  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0756  
[braun@adeq.state.ar.us](mailto:braun@adeq.state.ar.us)

Name: Elizabeth Kizer  
Title: Administrative Analyst  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0700  
[elizabeth.kizer@adeq.state.ar.us](mailto:elizabeth.kizer@adeq.state.ar.us)



Name: Trayc Welborn  
Title: Administrative Analyst  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0773  
[welborn@adeq.state.ar.us](mailto:welborn@adeq.state.ar.us)

Name: David Witherow  
Title: Associate Director  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0885  
[witherowd@adeq.state.ar.us](mailto:witherowd@adeq.state.ar.us)

Name: Thomas Rheume  
Title: Senior Operations Manager  
Organization: Energy & Environment (E&E)  
Contact Information:  
5301 Northshore Drive, North Little Rock, AR 72118  
(501) 682-0762  
[rheume@adeq.state.ar.us](mailto:rheume@adeq.state.ar.us)

Name: Terrie Wright  
Title: Environmental Protection Specialist  
Organization: United States Environmental Protection Agency (EPA) Region 6 (R6)  
Contact Information:  
1201 Elm Street, Dallas TX 75270  
(214) 665-8453  
[Wright.Terrie@epa.gov](mailto:Wright.Terrie@epa.gov)

Name: Kevin Kim  
Title: Environmental Engineer  
Organization: EPA R6  
Contact Information:  
1201 Elm Street, Dallas TX 75270  
(214) 655-8554  
[kim.kevin@epa.gov](mailto:kim.kevin@epa.gov)

#### **1.4 Project Organization** (EPA QA/R-5 A4)

The QAM is responsible for ensuring that all Energy and Environment (E&E), Division of Environmental Quality (DEQ) quality assurance (QA) programs at DEQ are being appropriately administered and QA procedures are being followed. QAM responsibilities for this QAPP include without limitation:

- Providing technical assistance to the project;
- Generating reports on departmental quality assurance activities;
- Coordinating communication between E&E and EPA R6 Office of Quality Assurance; and
- Reviewing and approving the QAPP;

The QAC is responsible for the overall direction of QA program activities within the Office of Air Quality (OAQ). QAC responsibilities for this QAPP include without limitation:

- Providing annual reports on QAPP activities to the QAM;
- Reporting any QA failures or project-related problems to the QAM;
- Providing technical assistance to the project;
- Reviewing and approving the QAPP.

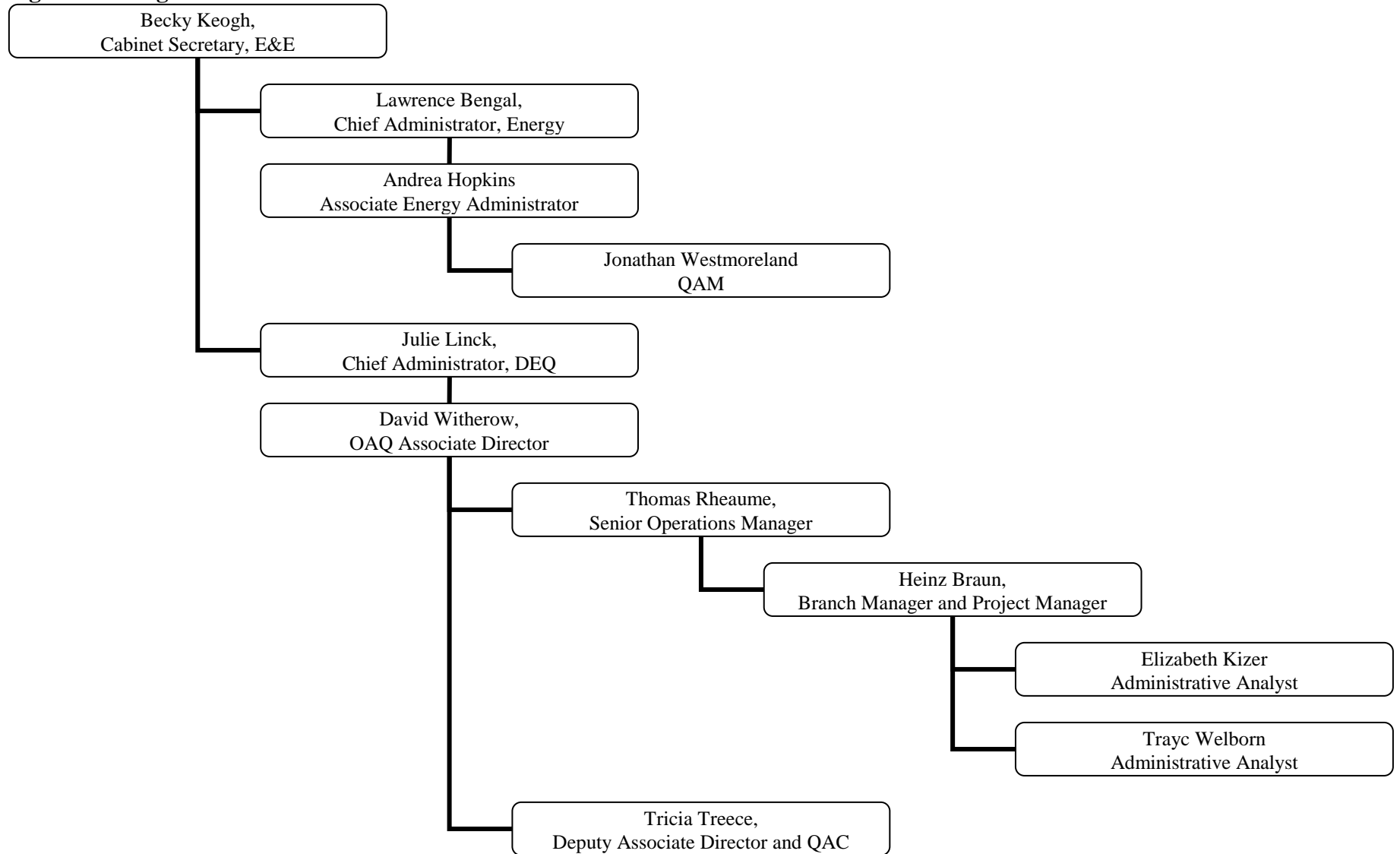
The Project Manager is responsible for overall planning and direction of compliance activities, QA activities for compliance and enforcement data, including entry of high priority (HPV) data. Responsibilities include without limitation:

- Preparing, updating, and revising the QAPP for Compliance and Enforcement data;
- Overseeing all training, hiring, and assignments of activities under this QAPP to appropriate personnel;
- Communicating with the Associate Director on work accomplished in this QAPP;
- Serving as a point of contact for EPA R6 regarding project data;
- Ensuring adherence to QA procedures included in this QAPP; and
- Reporting any QA problems or deviations that need to be resolved to the QAC.

The Administrative Analysts ensure that all data regarding the permitting, compliance, and enforcement activities for stationary sources are entered into the Integrated Compliance Information System (ICIS) database in accordance with the QA procedures established pursuant to this QAPP.

See Figure 1-1. Organization Chart

**Figure 1-1. Organization Chart**



Title: OAQ ICIS QAPP  
Revision Number: 1  
Revision Date: May 17, 2022  
Page 8 of 18

### **1.5 Problem Definition/Background** (EPA QA/R-5 A5)

DEQ is required to report continuous emission monitoring (40 CFR Part 60 and EPA guidance) and compliance and enforcement activities (40 CFR Parts 60, 61, 63 and EPA guidance) for Clean Air Act programs to the EPA Administrator through the use of the ICIS database. ICIS is designed to store and retrieve air pollution data to document and analyze air quality improvement. The data is used to develop and analyze control strategies. The data is also used to identify specific sources, industries, and emission sources for study, oversight, and enforcement. In addition, the data is used for the evaluation of regulatory effectiveness. Data accuracy is a high priority.

ICIS is a database used for handling the storage and retrieval of information pertaining to emissions and compliance activities of individual facilities, area and mobile source data. The ICIS database is managed by the U.S. Environmental Protection Agency, Office of Air Quality Planning and Standards, located in Research Triangle Park, North Carolina.

Data from ICIS is used in a variety of air program applications:

- National Ambient Air Trends Analysis;
- Characterization of Emission Source Categories;
- Targeting of Specific Sources for Analysis;
- Air Quality Modeling Activities;
- Development and Analysis of Control Strategies;
- Implementation of SIP programs;
- Attainment Demonstrations;
- Program Summaries;
- HPV Timeliness and Appropriateness;
- Enforcement Accomplishment Reports;
- Multimedia Initiatives;
- Penalty Data;
- Source Data for State Inspectors; and.
- Reporting Activity to State Management.

### **1.6 Project/Task Description and Schedule** (EPA QA/R-5 A6)

Project Manager activities under this project include:

- Hiring, as needed, and supervising Administrative Analysts;
- Providing Administrative Analysts with Minimum Data Requirements (MDR), ICIS program requirements, guidelines for data input, and all system documentation for coding;<sup>1</sup>
- Ensuring that Administrative Analysts complete requisite training to perform project activities, including periodic EPA Headquarters and R6 classes, as available;
- Assigning appropriate personnel to project tasks;
- Providing primary QA of data as received from program contacts;
- Coordinating the review of data to appropriate program areas;
- Coordinating training on QA procedures;

- Ensuring timely and error-free entry of required data pertaining to compliance, enforcement, and permitting:
  - Data will be entered into ICIS on a daily basis, or as received, on an ongoing basis;
  - Stack testing data results will be entered into ICIS within 120 days from the test date; and
  - All other reportable actions will be entered into ICIS within 60 days from the date of the action;
- Assessing data quality using monthly and quarterly retrieval audits and any specified data audits as designated by the QAM.
- Interpreting and analyzing project data for use in OAQ programs; and
- Ensuring adherence by all project personnel to QA procedures under this QAPP.

Administrative Analysts, under the direction of the Project Manager, will perform the following activities for this project:

- Collecting the requisite data pursuant to (40 CFR Parts 60, 61, 63 and EPA guidance) from program contacts for entry into ICIS.
- Timely and error-free reporting of facility data into ICIS fulfilling MDR and ICIS program requirements for:
  - New and modified Title V (TV) and 80% Synthetic Minor (SM-80) permits;
  - Inspection and other enforcement data, such as stack test information, compliance certifications, facility information (to include changes and revisions); and
  - Data pertaining to high priority violators (HPVs) and consent administrative orders (CAOs).
- Completing all requisite training and any additional training on the use of ICIS and QA procedures, as available; and
- Adhering to all QA procedures under this QAPP.

The Project Manager and Administrative Analysts participate in monthly calls with EPA Region 6 to discuss EPA reports pulled from ICIS data.

### **1.7 Quality Objectives and Criteria for Measurement Data** (EPA QA/R-5 A7)

Data collected for ICIS reporting will satisfy all ICIS reporting MDRs for delegated agencies including data pertaining to stationary source activities in all OAQ-delegated and OAQ-approved air programs delegated:

- State Implementation Plan (SIP);
- TV;
- SM-80;
- PSD;
- NSPS;
- NESHAP; and
- MACT.

The requisite data will be collected for all federally reportable sources, including those with emissions meeting major thresholds, SM-80s, sources in non-attainment areas, and sources with required monitoring.

### **1.7.1 Objectives and Project Decisions**

Data entry and data management under this project must be of sufficient quality for use in the development and analysis of control strategies, implementation of SIP Programs, attainment and source compliance demonstrations, choosing specific sources for analysis, program summaries, HPV timeliness and appropriateness demonstrations, enforcement and civil penalty data, reporting activity to the Department and Division's management and the development and generation of source data and emissions reporting to district Inspectors.

If any QA problems or deviations from measurement performance criteria/acceptance criteria are observed, the Project Manager will report such problems or deviations to the QAC as they arise. The QAC will report any QA failures or project-related problems to the QAM.

### **1.7.2 Action Limits/Levels**

This project involves data entry and data management and does not involve analytical operations or field measurements. Therefore, this QAPP element is not applicable.

### **1.7.3 Measurement Performance Criteria/Acceptance Criteria**

The ICIS database has quality control (QC) mechanisms in place to prevent errors in data entry, such as drop-down menus and validation controls. In addition, the Project Manager and Administrative Analysts have assessment mechanisms in place to ensure that measurement performance criteria are met. Table 1-1 provides the data quality indicators (DQIs), the measurement performance criteria for each DQI, and the QC or other mechanisms to be used to assess if the criteria were met.

DQI	Measurement Performance Criteria	QC or Assessment Mechanisms
Accuracy	Data entered into ICIS matches data included in records used for ICIS Entry	Data validation programmed into ICIS database  Administrative Analyst reviews data entered into ICIS by the other Administrative Analyst against referenced record.  Project Manager performs periodic assessment of ICIS summary data.
Completeness	All data required under EPA	Administrative Analyst reviews

	minimum data requirements and ICIS program requirements for delegated agencies is entered within the timeframes specified in the Clean Air Act State Review Framework (SRF) <sup>2</sup> .	data entered into ICIS by the other Administrative Analyst against referenced record.  Project Manager performs periodic assessment of ICIS summary data.
--	--	---

### **1.8 Special Training Requirements/Certification** (EPA QA/R-5 A8)

All state personnel using the system (reporting data or using retrievals for job performance) shall be trained in the use, structure, and procedures for data retrieval from ICIS. The Project Manager provides training or may use training sessions provided EPA Headquarters or by EPA Region 6. No special certification is required. However, the Project Manager will maintain training records in physical or digital form to certify to his or her supervisor, the QAM, and the QAC that users of the system are trained or, if additional training is necessary, will attend scheduled training(s).

Additionally, the Project Manager and the Administrative Analysts may attain additional training sessions/conferences, as available, to maintain a high level of expertise concerning use of the database, and to maintain contact with like states and other state and national database personnel.

### **1.9 Documents and Records** (EPA QA/R-5 A9)

This project does not generate field or laboratory documentation and records. Instead, this project involves data entry and management of existing data from compliance, enforcement and permitting operations. Section 2.9 of this QAPP describes the purpose for the original collection of data and its relevance to this project. Section 2.10 describes data management procedures for this project.

#### **1.9.1 QA Project Plan Distribution**

This QAPP will be distributed to the identified personnel listed in Section 1.3 via email. A copy of the QAPP will be maintained digitally on E&E network drives.

#### **1.9.2 Field Documentation and Records**

This sub-element is not applicable to this project.

#### **1.9.3 Laboratory Documentation and Records**

This sub-element is not applicable to this project.

#### **1.9.4 Quarterly and/or Final Reports**



EPA R6 generates monthly reports from ICIS data entered by E&E staff. These data are discussed at a monthly meeting involving the Administrative Analysts, Project Manager, and EPA R6 personnel.

## **2.0 DATA GENERATION AND ACQUISITION**

This project involves data entry and management of existing data from compliance, enforcement and permitting operations. Section 2.9 of this QAPP describes the purpose for the original collection of data and its relevance to this project. Section 2.10 describes data management procedures for this project.

### **2.1 Sampling Design (Experimental Design)** (EPA QA/R-5 B1)

This sub-element is not applicable to this project.

### **2.2 Sampling Methods** (EPA QA/R-5 B2)

This sub-element is not applicable to this project.

### **2.3 Sample Handling and Custody** (EPA QA/R-5 B3)

This sub-element is not applicable to this project.

### **2.4 Analytical Methods** (EPA QA/R-5 B4)

#### **2.4.1 Field Measurements Methods**

This sub-element is not applicable to this project.

#### **2.4.2 Field Analyses Methods**

This sub-element is not applicable to this project.

#### **2.4.3 Laboratory Analyses Methods (Off-Site)**

This sub-element is not applicable to this project.

### **2.5 Quality Control Requirements** (EPA QA/R-5 B5)

#### **2.5.1 Field Sampling Quality Control**

This sub-element is not applicable to this project.

#### **2.5.2 Field Measurement/Analysis Quality Control**

This sub-element is not applicable to this project.

#### **2.5.3 Laboratory Analysis Quality Control**

This sub-element is not applicable to this project.

### **2.6 Instrument/Equipment Testing, Inspection, and Maintenance** (EPA QA/R-5 B6)

### **2.6.1 Field Measurement Instruments/Equipment**

This sub-element is not applicable to this project.

### **2.6.2 Field Instruments/Equipment (Screening and Definitive)**

This sub-element is not applicable to this project.

### **2.6.3 Laboratory Analysis Instruments/Equipment (Off-Site)**

This sub-element is not applicable to this project.

## **2.7 Instrument/Equipment Calibration and Frequency** (EPA QA/R-5 B7)

### **2.7.1 Field Measurement Instruments/Equipment**

This sub-element is not applicable to this project.

### **2.7.2 Field Instruments/Equipment (Screening and Definitive)**

This sub-element is not applicable to this project.

### **2.7.3 Laboratory Analysis Instruments/Equipment (Off-Site)**

This sub-element is not applicable to this project.

## **2.8 Inspection/Acceptance Requirements for Supplies and Consumables** (EPA QA/R-5 B8)

### **2.8.1 Field Sampling Supplies and Consumables**

This sub-element is not applicable to this project.

### **2.8.2 Field Measurement/Analyses (Screening and Definitive) Supplies and Consumables**

This sub-element is not applicable to this project.

### **2.8.3 Laboratory Analyses (Off-Site) Supplies and Consumables**

This sub-element is not applicable to this project.

## **2.9 Data Acquisition Requirements (Non-Direct Measurements)** (EPA QA/R-5 B9)

Data entered into ICIS has several uses including the development and analysis of control strategies, implementation of SIP provisions, attainment and source compliance demonstrations, choosing specific sources for analysis, program summaries, HPV timeliness and appropriateness demonstrations, enforcement and civil penalty data, reporting activity to the Department and Division's management and the development and generation of source data and emissions reporting to district Inspectors. This data is acquired from Compliance, Enforcement, and Permits records. The path of data generation and acquisition, along with the process to determine that data is of acceptable quality is described in Section 2.10.

## **2.10 Data Management** (EPA QA/R-5 B10)

On an as received basis, Administrative Analysts enter the requisite data into ICIS using records obtained from OAQ Compliance, Enforcement, and Permits staff. Records used for ICIS data entry are retained in a central file for a minimum of one year. In addition, digital copies of all out-going Compliance, Enforcement, and Permitting records used for data acquisition under this project are stored in the ZYLAB state document retrieval system. Specific data generation and acquisition of records are broken down by category below.

### **2.10.1 Inspection Data Acquisition**

Administrative Analysts obtain inspection data from inspection reports written by district Inspectors. Upon completion of each inspection, the district Inspector submits a draft inspection report to their Inspector Supervisor via E&E's web-based ePortal system. The ePortal system creates a unique submission ID for each inspection report. The data acquisition process bifurcates based on whether the inspected facility is determined to be "in-compliance" or "out-of-compliance."

If the facility is determined to be "in-compliance" after the Inspector Supervisor review process is complete, the report and a letter is forwarded electronically via ePortal to the Administrative Analyst for data entry into ICIS, mailing, and further routing.

If the facility is determined to be "out-of-compliance" after the Inspector Supervisor review is complete, the report and an "Area of Concern" letter is forwarded electronically via ePortal to the Administrative Analyst for data entry into ICIS, mailing, and further routing. This letter is sent to the relevant facility contacts along with a copy of the inspection report and any other relevant information. This letter notifies the facility contacts of any "areas of concern" and provides them with an opportunity to provide feedback within thirty days of receipt. At the end of the thirty-day period (or when a response is received), the Inspector, Inspector Supervisor and Compliance Branch Manager review the response and determine whether to issue an enforcement referral.

If an enforcement referral is required as a result of an inspection, the Inspector attaches to an enforcement referral sheet and all other relevant documentation to the inspection report ePortal submission. The Compliance Branch Manager forwards the submission with the enforcement referral to the Enforcement Section Supervisor.

### **2.10.2 Other Compliance Data Acquisition**

Administrative Analysts obtain continuous emissions monitoring (CEMS) data, stack testing information and results, and compliance certification reports from district inspectors. Facility contacts directly submit CEMS data, stack testing information and results, and compliance certification reports to DEQ via ePortal. Each submission is reviewed by a district Inspector who is assigned based on the location of the facility.

The district Inspectors review CEMS data and stack test results to determine whether the facility passed or failed the test and whether required testing procedures were followed. The district Inspector notifies the facility of the pass/fail status via a letter and this letter is forwarded to the Administrative Analyst for entry of the requisite data into ICIS via ePortal. If the results indicate that a facility failed any part of the test, the results letter is forwarded to the Enforcement Section Supervisor as an enforcement referral.

The district Inspectors review Annual Compliance Certification (ACC) reports and complete an ACC review sheet. The review sheet is then reviewed by the Inspector's supervisor. Upon completion of review, the ACC review sheet is forwarded to the Administrative Analyst via ePortal for entry of requisite data into ICIS.

### **2.10.3 Enforcement Data Acquisition**

The Administrative Analysts obtain enforcement data from the OAQ Enforcement Branch. The Enforcement Section Supervisor reviews enforcement referrals to determine whether any "areas of concern" qualify as HPV. The Enforcement Section writes a letter notifying facility contacts if the identified "area(s) of concern" are HPV, if informal enforcement action has been determined as necessary, or if no enforcement action has been determined as necessary. The information concerning determinations with respect to whether the "area(s) of concern" constitute an HPV or if informal or no action is required is forwarded to the Administrative Analysts who enter the requisite data into ICIS. The Administrative Analysts continue to enter new information—including information pertaining to notices of violation, administrative orders, consent administrative orders, penalty amounts, and date of HPV determinations—into ICIS as received by the Enforcement Section as each case proceeds to resolution.

### **2.10.4 Permit Data Acquisition**

Administrative Analysts obtain permit data from the OAQ Permits Branch. The Permits Branch forwards the Administrative Analysts a notification and copy of each final permit issued, including newly issued and modified:

- Minor source permits;
- TV permits; and
- SM80 permits.

The Administrative Analysts review the notification and permit to determine whether the facility is in ICIS or if the facility needs to be entered into ICIS as a new source. For all newly issued and stationary source permits, Administrative Analysts enter the following information into ICIS:

- Date of final permit issuance;
- Applicable air programs (e.g. SIP, TV, SM80, PSD, NSPS, NESHAP, and/or MACT);
- Permitted pollutants and classifications.

For TV and SM80 permits, the Administrative Analyst enters all additional ICIS- and MDR-required data.

### **3.0 ASSESSMENT AND OVERSIGHT**

#### **3.1 Assessments/Oversight and Response Actions** (EPA QA/R-5 C1)

The Project Manager performs quarterly and additional ad-hoc assessments of ICIS data entry procedures and outcomes to ensure timely, accurate, and complete entry of all requisite data into ICIS. The success/acceptance criteria are described in Section 1.7.3 of this QAPP. The Project Manager supervises the Administrative Analysts and has the authority to require corrections, revise procedures consistent with this QAPP, and require additional training, as necessary.

Assessments include comparison of ICIS summary data to external E&E-hosted databases, including the DEQ Facility and Permit Summary database,<sup>3</sup> DEQ Complaints and Inspections Data database,<sup>4</sup> and other internal databases maintained for QC purposes. Ad-hoc assessments may include verifying that known changes or developments have been incorporated into ICIS data.

#### **3.2 Reports to Management** (EPA QA/R-5 C2)

The Project Manager reports to management on project activities upon request.

### **4.0 DATA REVIEW AND USABILITY**

#### **4.1 Data Review, Verification, and Validation Requirements** (EPA QA/R-5 D1)

See Sections 1.7.3 and 2.10.

#### **4.2 Verification and Validation Methods** (EPA QA/R-5 D2)

See Sections 1.7.3, 2.10, and 3.1

#### **4.3 Reconciliation with User Requirements** (EPA QA/R-5 D3)

Data entered under this project becomes part of EPA's web-based ICIS-AIR data retrieval system. This system allows EPA, states, and members of the public to search for compliance and enforcement data using any combination of facility name, geographic location, standard industrial classification, and/or pollutant. This data can be used for a number of purposes. See Section 1.5 for examples of data uses.

## 5.0 REFERENCES

1. ICIS-AIR: Minimum Data Requirements—Delegated Agencies can be accessed at [https://usepa.servicenowservices.com/sys\\_attachment.do?sys\\_id=ba5329c61be64d54fd044262f54bcb1&view=true](https://usepa.servicenowservices.com/sys_attachment.do?sys_id=ba5329c61be64d54fd044262f54bcb1&view=true)
2. State Review Framework Arkansas Final Reports can be accessed at <https://www.epa.gov/compliance/state-review-framework-srf-arkansas-final-reports>
3. The DEQ Facility and Permits Summary (PDS) database can be accessed at <https://www.adeq.state.ar.us/home/pdssql/pds.aspx>
4. The DEQ Complaints and Inspection Data database can be accessed at <https://www.adeq.state.ar.us/complaints/searches/>
5. The ICIS-AIR Search webpage is accessible at <https://www.epa.gov/enviro/icis-air-search>.