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QUALITY ASSURANCE PROJECT PLAN FOR THE INTEGRATED COMPLIANCE INFORMATION SYSTEM (ICIS)


Submitted by the
MARYLAND DEPARTMENT OF THE ENVIRONMENT
SCIENCE SERVICES ADMINISTRATION
1800 Washington Boulevard,
Baltimore, MD 21230

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Approvals:


Heather Nelson,
Environmental Program Manager III
MDE Compliance Program

2/4/15
Date


Lucinda Power, EPA Project Officer
Chesapeake Bay Program Office

1/28/15
Date


Richard Batiuk, EPA QA Officer
Chesapeake Bay Program Office

1/20/2015
Date

Maryland Department of the Environment
Quality Assurance and Quality Control Plan for ICIS Data Management

1 Introduction:

This Quality Assurance and Quality Control (QAQC) Plan contains an outline of the systematic operation of the Enforcement Division in the Compliance Program of Water Management Administration, Maryland Department of the Environment (MDE); the regular work procedures of staff and approaches to ensure data accuracy, integrity and timely reporting of the National Pollutant Discharge Elimination System (NPDES) Discharge Monitoring Report, Inspection and Enforcement Information for Maryland major and minor facilities in the Integrated Compliance Information System (ICIS).

2 Organization and Structure:

Administration Officers

Name: David Lyons, Environmental Program Manager IV
Phone: 410-537-3626

Responsibilities: Director, Maryland Department of the Environment, Water Management Administration, Compliance Program; oversight of the performance of the Compliance Program and supervisor of Heather Nelson.

Name: Heather Nelson, Environmental Program Manager III
Phone: 410-537-3528

Responsibilities: Deputy Director, Maryland Department of the Environment, Water Management Administration, Compliance Program; oversight of the performance of the Compliance Program's four divisions, including those of the Enforcement Division related to ICIS and supervisor of Sharon Talley..

Name: Sharon Talley, Environmental Program Manager II
Phone: 410-537-3979

Responsibilities: Division Chief, Enforcement Division in the Compliance Program, oversight of the performance of the Enforcement Division and supervisor of Julie Gowe and Jesse Salter, the Section Heads who oversee the performance of ICIS Data Entry, Data Review and Enforcement Planner staff.

Name: Julie Gowe, Environmental Program Manager I
Phone: 410-537-3511

Responsibilities: Enforcement Manager, Enforcement Division, who oversees the assignments to and performance of William Lee, Joy Warburton, Brenda Waters, , Linda Eisgruber, Arno Laud and Kevin Bull.

Name: Jesse Salter, Environmental Program Manager I
Phone: 410-537-3570

Responsibilities: Manager, Technical Services & Permitting Section, Enforcement Division, who oversees the assignments to and performance of Kathy Mohan, Corrine Boston, Cindy Pantalone, Rebecca Hebler and Karen Vincent. Also prepares EPA Section 106 Grant reports and other reports using data from ICIS.

Data Entry Employees

Name: William Lee, Administrative Officer III
Phone: 410-537-3514

Responsibilities: ICIS-NPDES Manager, Detailed ICIS oversight, ICIS reporting activities, trouble shooting for problems related to ICIS, representing MDE in discussions with EPA about ICIS, assisting Joy Warburton and

Brenda Waters with data entry based on backlog or complexity. Inspection data entry based on monthly summary sheets sent by Compliance Program inspectors. Also prepares various reports from Business Objects/Business Intelligence (BOBI). Run Quarterly Non-Compliance Reports (QNCR) every two to three weeks. Investigate any DMR/ICIS irregularities and resolve as needed. Provide ICIS training to new ICIS data entry and data review staff.

Train MDE staff and permit holders how to properly use and submit DMRs through NetDMR. Check Copy of Record (COR) each month, identify violations and submit COR in an email to the Division Chief and the Enforcement Planner when violations are identified.

Name: Joy Warburton, Office Clerk II

Phone: 410-537-3129

Responsibilities: Enters DMR data into ICIS. Run violation summaries from BOBI for non-major facilities and distribute to MDE staff monthly and individual violation summaries for minors as requested.

Name: Brenda Waters, Office Clerk II

Phone: 410-537-3649

Responsibilities: Enters permit and enforcement action data into ICIS. Scans DMRs into MDE's FORTIS database. Enter DMRs into ICIS as necessary and perform all phases of ICIS data entry as needed

Name: Carol Hasselberger, Office Secretary III

Phone: 410-537-3369

Responsibilities: Enters DMRS into DMR receipt log as they are received in the Compliance Program and provides the DMRs to Joy Warburton for entry into ICIS.

Name: Mahogany Tobias, Office Secretary III (MCET Contractor)

Phone: 410-537-3556

Responsibilities: Manages DMR receipt log and determines which facilities are not submitting DMRs as required by the NPDES permit.

Enforcement Planner

Name: Linda Eisgruber, Sanitarian IV

Phone: 410-537-3518

Responsibilities: Enforcement Planner, reviews DMRs to identify violations and significant non-compliance (SNC) status, determines if enforcement action is warranted, provides information about enforcement actions for entry into ICIS, reviews ICIS reports to identify the compliance status of NPDES permittees.

Name: Natural Resources Planner, II (Vacant)

Phone:

Responsibilities: Enforcement Planner, reviews DMRs to identify violations and significant non-compliance (SNC) status, provides information about enforcement actions for entry into ICIS, reviews ICIS reports to identify the compliance status of NPDES permittees.

Name: Arno Laud, Natural Resources Planner II

Phone: 410-537-4174

Responsibilities: Enforcement Planner and currently enters DMR data for major NPDES facilities into ICIS, reviews DMRs to identify violations and significant non-compliance (SNC) status, determines if an enforcement action is warranted, provides information about enforcement actions for entry into ICIS, reviews ICIS reports to identify the compliance status of NPDES permittees. Runs monthly violations summaries for major facilities. Compares the data in ICIS for all major permits with the data submitted on the DMRs.

Assists William Lee with training MDE staff and permit holders the use of NetDMR. (MDE staff is in-house training; outside staff is trained through the Maryland Center for Environmental Training (MCET))

Name: Kevin Bull, Natural Resources Planner II (MCET Contractor)

Phone: 410-537-4411

Responsibilities: Enforcement Planner, reviews DMRs to identify violations and significant non-compliance (SNC) status, provides information about enforcement actions for entry into ICIS, reviews ICIS reports to identify the compliance status of NPDES permittees.

Data Review Employees

Name: Administrative Officer II-vacant

Phone:

Responsibilities - Compares NPDES permit data and monthly inspection/enforcement summary with data in ICIS. Reviews reports from ICIS and ECHO to confirm data accuracy, integrity and timely and complete submission of reports and data.

Name: Carol Hasselberger, Office Secretary III

Phone: 410-537-3369

Responsibilities: Enters DMRS into DMR receipt log as they are received in the Compliance Program and provides the DMRs to Joy Warburton for entry into ICIS.

Name: Mahogany Tobias, Office Secretary III (MCET Contractor)

Phone: 410-537-3556

Responsibilities: Manages DMR receipt log and determines which facilities are not submitting DMRs as required by the NPDES permit.

3 Implementation of Work Process

3.1 Entry of NPDES Permit into ICIS

Two data entry employees enter NPDES permit data into ICIS. Any new or renewed NPDES permit should be entered into ICIS within 14 days after it is delivered to the Compliance Division. If any aspect of the permit is unclear, the ICIS data entry persons should contact the staff of the Wastewater Permit Program to get clarification. All the permits newly entered into ICIS are provided to the Data Review Employee to proofread and compare with the data entered into ICIS to ensure accuracy of the data.

3.2 Entry of DMRs and Single Event Violations into ICIS

The Data Review Employee updates the DMR Receipt Log, which is an Excel spreadsheet on a shared directory, recording the received date of permittee submitted monthly, quarterly or annual DMRs. The Data Review Employee then forwards the DMR to the Data Entry Employee who enters the DMR data carefully to guarantee accuracy when entering data into ICIS. After completing each DMR data entry, ICIS will show whether there is a violation and the type of violation by comparing the DMR data to the facility's NPDES permit. If ICIS shows there is a violation, the Data Entry Employee should check back and see whether there is any input mistake, such as the wrong decimal placement, transposition of numbers or incorrect units. Non-reporting of permit parameters will also be identified in addition to effluent violations. The Data Entry Employee attaches a violation report to the copy of the DMR. scanned The DMRs are then scanned into FORTIS by Data Review and/or Data Entry employees. DMRs scanned into FORTIS are forwarded to the appropriate Enforcement

Planner for manual review and attachment of a DMR review sheet that indicates the facility compliance status and action to be taken to address significant noncompliance (SNC) identified during the review process.

Preprinted DMRs are provided to all facilities upon request to standardize the format of DMRs and enable consistent DMR reporting based on permit conditions established in ICIS. If the Data Entry Employee finds the DMR does not match the required permit information in ICIS, the DMR is flagged and a copy with corrections noted is sent by the Data Entry Employee to the permittee with directions on DMR reformatting and a request to complete DMRs following the guidance. A copy of this notice is provided to the Enforcement Planner

The ICIS-NPDES Administrative Officer III enters single event noncompliance data into ICIS weekly following receipt of permittee submitted 5 day written noncompliance reports. A hard copy report of all noncompliance reports is also maintained in a binder by the ICIS-Administrative Officer III and the applicable Enforcement Planner.

3.3 Entry of inspection information into ICIS

NPDES facilities are inspected at the frequency established by the 106 Grant and MDE Priority scheme. Compliance Program Inspectors record on a Monthly Inspection Summary sheet the dates of NPDES inspections, whether a facility is compliant or noncompliant, type of inspection (compliance sampling inspection, compliance evaluation inspection etc.) and submit the Monthly Inspection Summary to the ICIS-NPDES Administrative Officer III each month for ICIS data entry.

Reports of inspections of major and minor facilities are submitted by the ICIS-NPDES Administrative Officer III to Jesse Salter quarterly (by the 20th day following quarter end) to EPA to ensure semi-annual EPA 106 Grant deadlines are met.

The inspection reports are reviewed as necessary by a Data Review Employee on a monthly basis.

3.4 Review of DMRs by Enforcement Planner and Entering Enforcement Actions into ICIS

When the Enforcement Planner receives DMRs each month, they will review the parameter limits, reported levels of discharge and the final effluent data from the daily, weekly or monthly collected samples. If any data that should be reported is missing, the Planner will contact the responsible person of the facility to provide the missing data or refer to the Inspector to obtain missing information.

If ICIS shows there is a violation, the Enforcement Planner will compare the discharge data to the limits shown in the NPDES permit to determine whether the violation report is correct. If no violation is identified according to the DMR data but ICIS reports there is a violation, the Enforcement Planner contacts the t Data Entry Employee to determine whether the permit data in ICIS has been entered correctly. If this process verifies the violation, the Enforcement Planner decides if the facility is in SNC. If so, the Enforcement Planner initiates appropriate enforcement action by preparing a litigation package, information request letter to the permittee or settlement letter as appropriate. The enforcement action information is entered into and updated in ICIS within 10 days of finalizing a formal or informal enforcement action and coded as per EPA guidance. The Enforcement Planner will complete the Enforcement Action coding sheet and provide it to the Data Entry Employee when enforcement actions, including administrative, judicial orders and penalties are finalized or issued and when consent order milestones need to be updated.

The Data Review Employees will check the enforcement action log monthly and compare to MDE enforcement action databases to confirm all NPDES related actions have been timely entered into ICIS.

DMRs that are submitted through NetDMR are reviewed monthly. The Copy Of Record (COR) for each is downloaded and viewed by the ICIS-NPDES Manager. If a COR is submitted with violation(s), a copy of the COR is sent to the division where the facility is located. A copy of the email alert is also sent to the Enforcement Coordinator and/or Enforcement Managers. CORs without violations are left in NetDMR.

3.5 Review of permit and DMR data

The Data Review Employees/Enforcement Planners review the permit data entered into ICIS monthly or as necessary, then review and update the DMR Receipt Log monthly for those facilities required to submit DMRs.

The Data Review Employee will randomly select DMRs to review monthly to verify data accuracy and integrity. This employee is also responsible for managing the DMR Receipt Log and will check whether DMRs are received and entered timely, verifying those permittees with delinquent DMR submissions and will report the facilities not submitting DMRs on time to the Enforcement Planner.

3.6 Review of Violation reports from ECHO, ICIS and OTIS

The Data Review Employees/Enforcement Planners will review the ICIS, ECHO Watch List and other violation reports monthly including the quarterly noncompliance report (QNCR) for majors to confirm effluent and reporting violations. They will compare the DMR data of the facility listed and SNC criteria to check whether the facility is in SNC, has not reported certain parameters or did not timely submit DMRs. If they identify a problem in the Watch List or violation reports, they will forward it to the Enforcement Planner and provide a summary list of data issues/violations to the Division Chief, ICIS-NPDES Manager and the Enforcement Manager. The Enforcement Planner and ICIS-NPDES Manager shall ensure data discrepancies are verified and corrected by coordinating with Data Entry Employees. The Data Review Employees also will check whether the problems reported for the previous month's review have been resolved and continue to report the problems not resolved.

3.7 Correction of identified data errors

If errors are identified in the reporting tools, such as ECHO and Envirofacts, are pointed out to be from ICIS, the Data Entry Employees check DMRs and permits of the facility. If the violation proves to be an error, it should be corrected immediately. After resolving the problem, the Data Entry Manager sends the correct information to every reporting tool having that wrong data and advises EPA of the error at the Quarterly Enforcement meeting with EPA Region III.

4 Documentation and Record Management

Electronic copies of permits are maintained on the Google network and the data entry employees have access to the network. Permits that have been entered into ICIS are recycled. But the Compliance Division keeps the permits until the electronic permits are put on the network. The Permitting Division keeps the hard copy permits and the inspectors also keep a copy of the permit. DMRs for surface water discharge permittees are scanned and copied after they are entered into ICIS. The hard copies are passed to the Data Review Employee for proofreading and archived after review. The electronic copies of DMRs are conserved in FORTIS for use in future checking and reference.

5 Regular Meeting and Work Summary

ICIS staff will strive to meet monthly or more often as necessary to share and discuss reporting or data integrity problems/issues they have identified. Data entry errors, discrepancies and other ICIS data management issues shall be reported to management, and effective ways to avoid recurrences will be discussed.

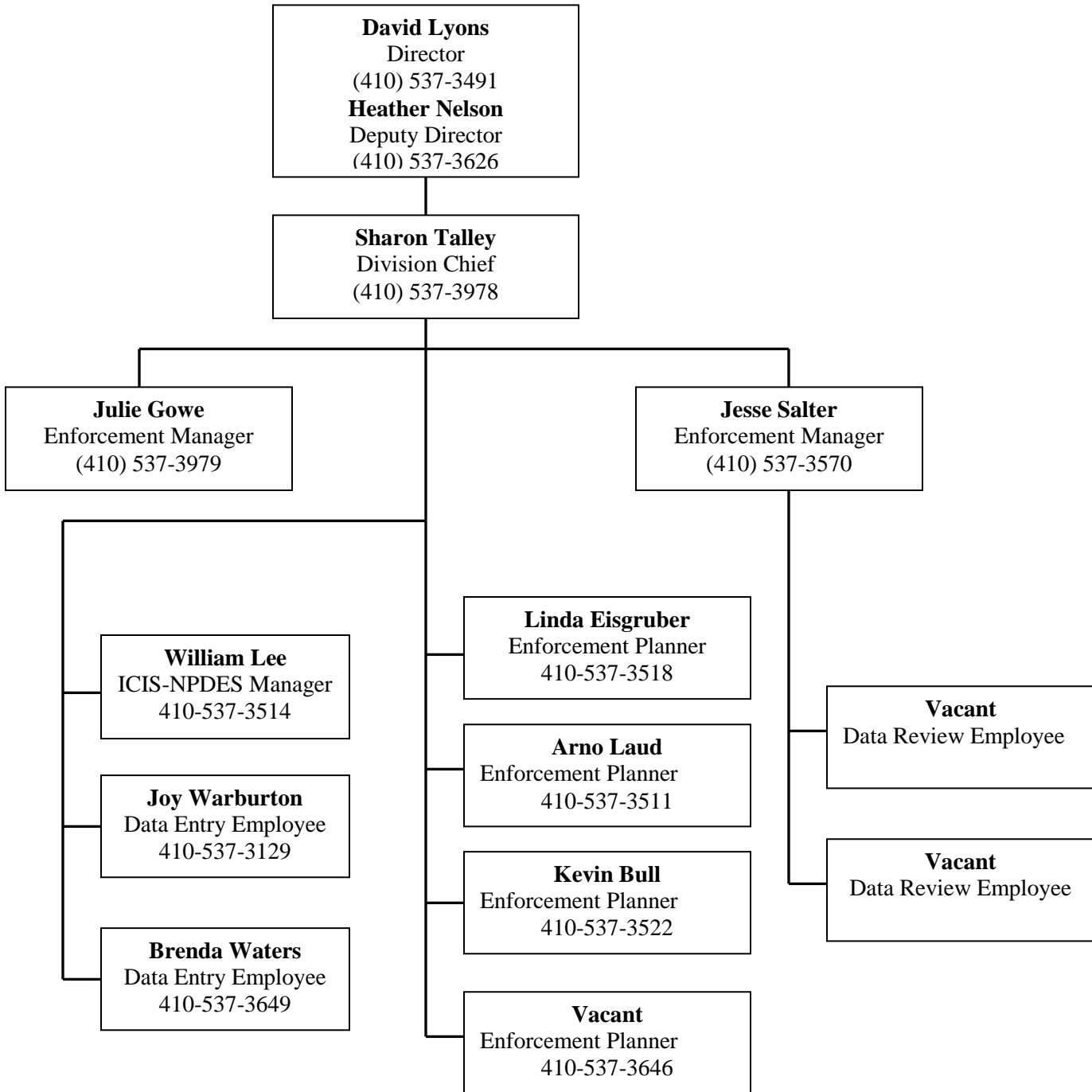
6 Computer Hardware and Software Development

The MDE's Information technology (IT) staff is responsible for the installation and maintenance of the computers within the Water Management Administration. Any computer problems should be solved within two days to guarantee the regular working of the NPDES data management and normal operation of the Department. Every computer is updated with the latest version of Microsoft Office software and Internet explorer.

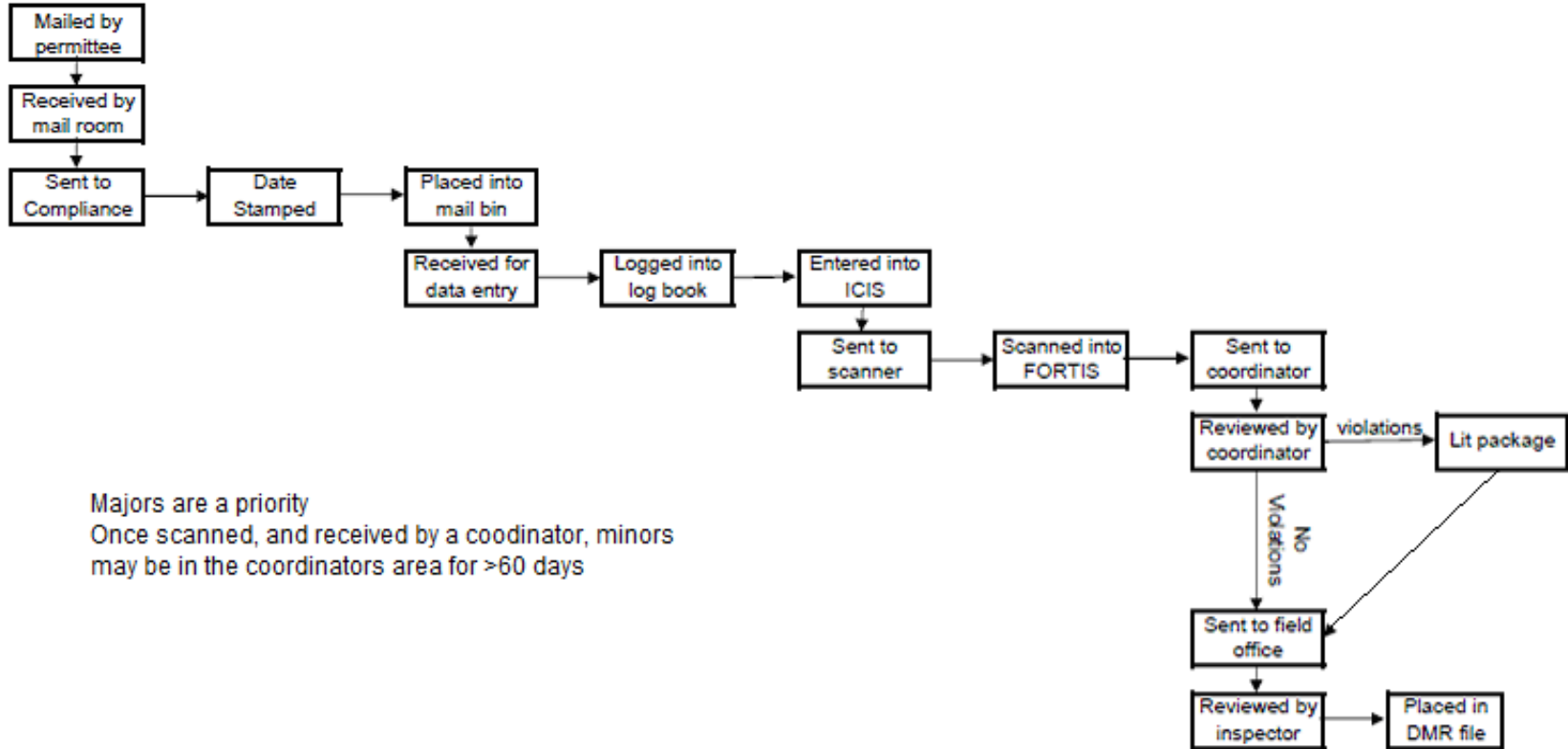
7 Competency

In accordance with EPA's policy that MDE provide documentation of competency of staff involved in the generation or use of environmental data, MDE is attaching the required job specifications necessary for each position as noted in Section 2 Organization and Structure. More position specific descriptions are maintained at MDE for the work conducted by the staff as noted in this document and performance reviews are conducted semi-annually. In addition, MDE follows and reviews EPA guidance documents including EPA's standards and methods when conducting or reviewing sampling events or laboratory analysis in relation to the Clean Water Act.

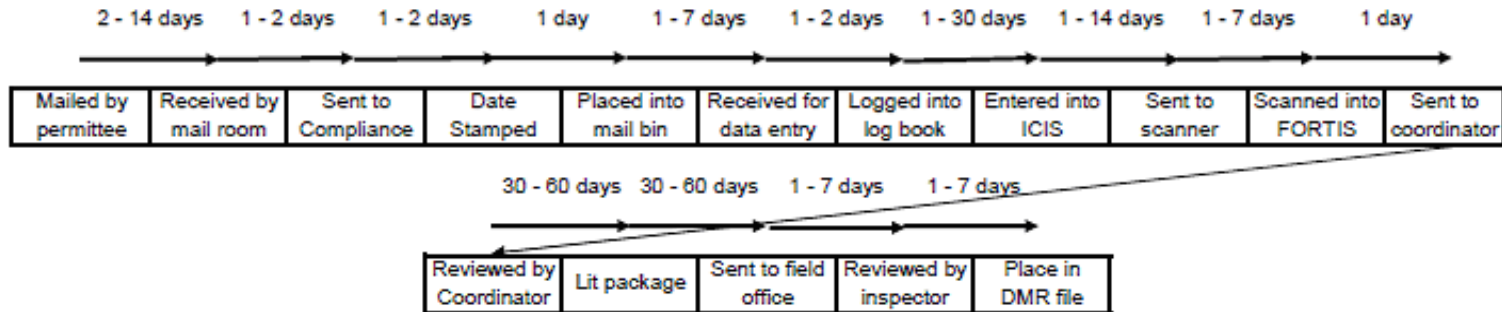
Appendix A
ICIS System Organization Chart



Appendix B DMR Flow Chart

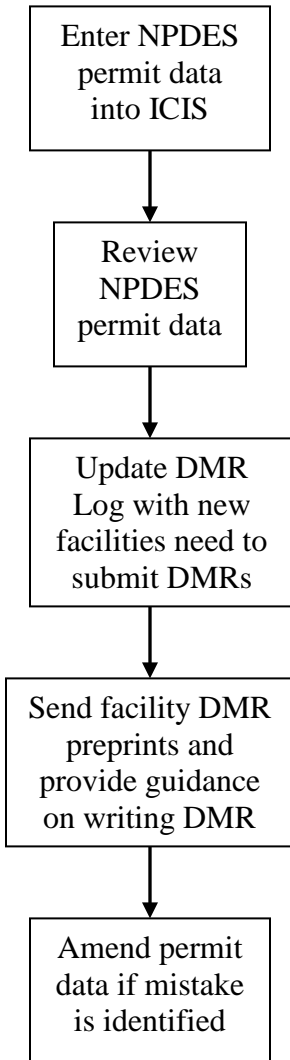


Majors are a priority
Once scanned, and received by a coordinator, minors may be in the coordinators area for >60 days

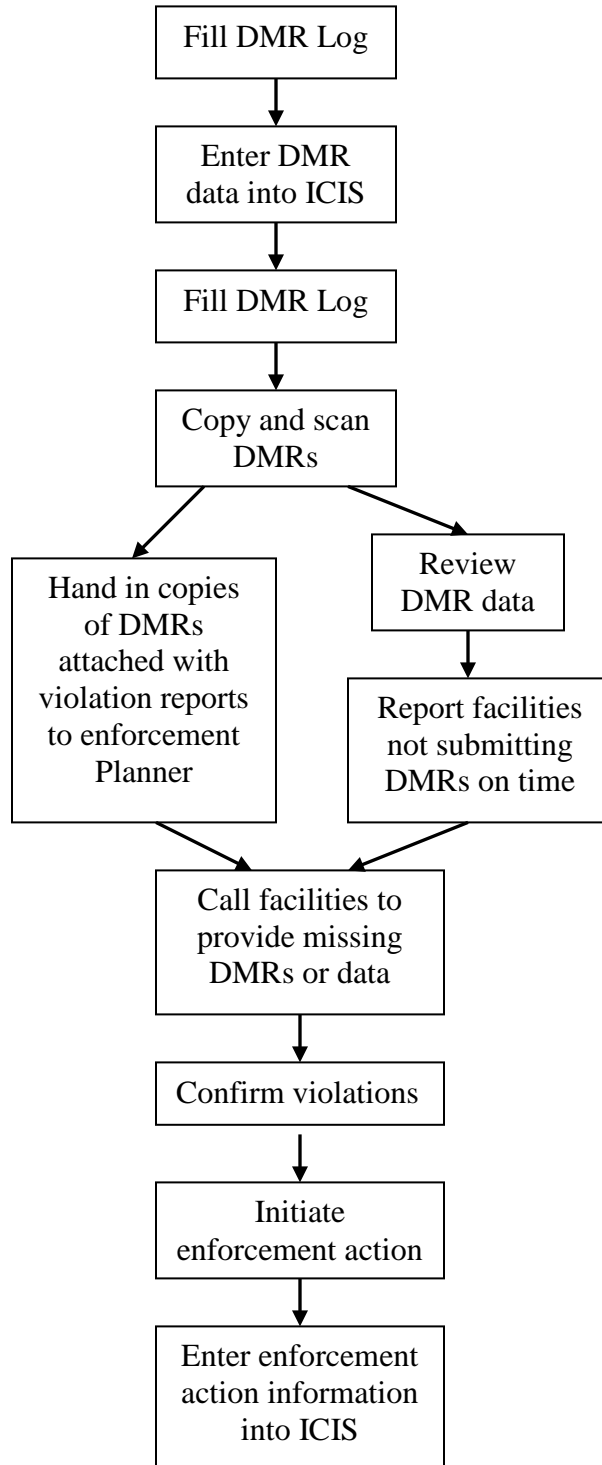


Appendix C
Data Administration Flow Chart

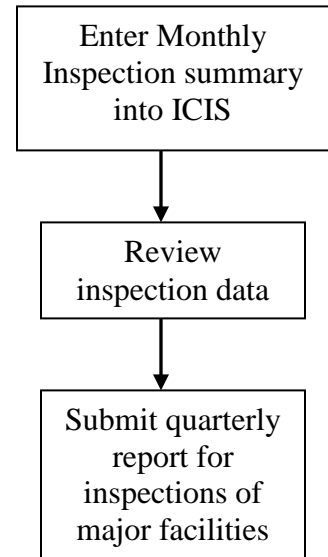
NPDES permit data administration



DMR and violation data administration



Inspection data administration



Appendix D
List of Acronyms

DMR	Discharge Monitoring Report
ECHO	Enforcement & Compliance History Online
EPA	Environmental Protection Agency
ICIS	Integrated Compliance Information System
MDE	Maryland Department of the Environment
NPDES	National Pollutant Discharge Elimination System
QAQC	Quality Assurance and Quality Control
QNCR	Quarterly Non-Compliance Report
SNC	Significant Non-Compliance