

US EPA, Office of Enforcement and Compliance Assurance, Office of Compliance, Enforcement Planning, Targeting & Data Division (EPTDD)

Closeness of Fit Analysis (COFA) of AFS to the Integrated Compliance Information System (ICIS) and the Introduction of AFS Business Rules



Background:

The Needs Analysis completed in December 2002 provided EPA with a definitive statement of EPA/State information requirements for the National air compliance/enforcement program.

To complete the Needs Analysis report, a workgroup was formed to confirm and prioritize identified needs.



Needs Analysis Workgroup Members:

John Downs, OKDEQ

David Finlayson, NYDEC

Christine Monk, ALDEM

Alice Nelson, VADEQ

Jim Pennington, FLDEP

Keith Duncan, STAPPA

Mamie Miller, EPA HQ

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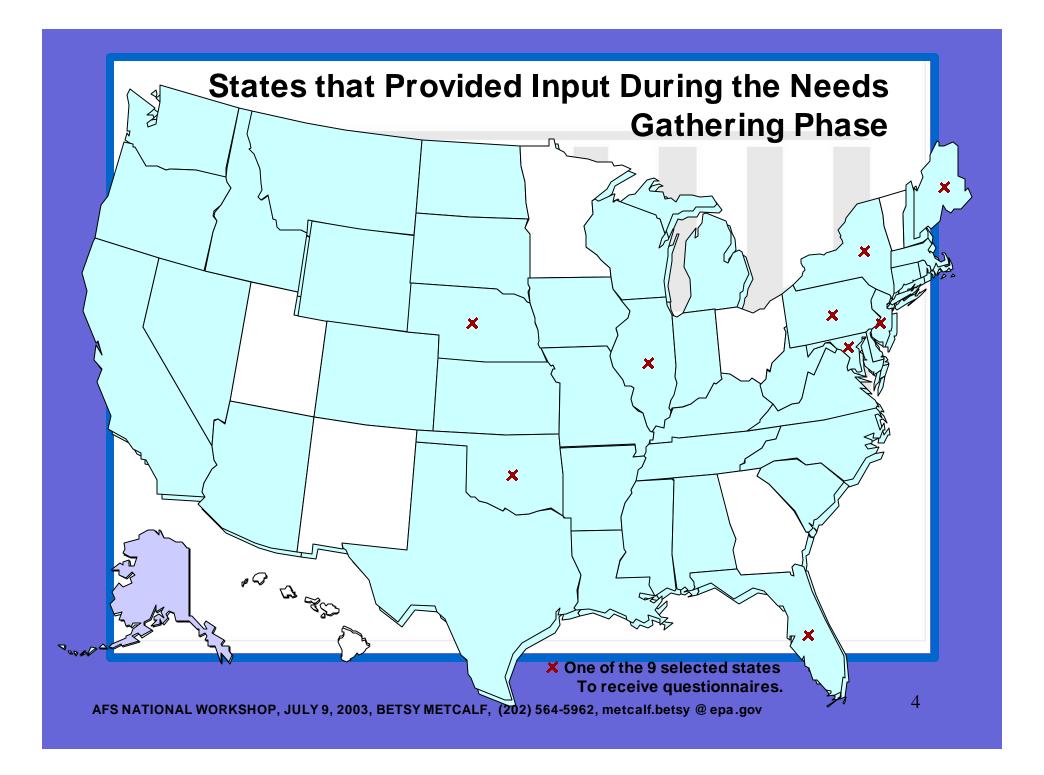
Mark Antell, EPA HQ

David Sprague, EPA HQ

Ron Rutherford, EPA R8

Burnie Turlinski, EPA R3

Duane James, EPA R9





The Needs Analysis identified 96 high priority technical and program requirements.

The Workgroup also identified some action items:

- •MDR Statement to Users: NO NEW DATA REQ
- Data Ownership: Everyone's Responsibility
- •Action Code Workgroup: Standardize action reporting.
- •OECA Evaluation of the need for Unit/Process information.
- •Coordination with OAQPS for access to permit data.
- Compliance Status: Reevaluate and define.
- Compare AFS to ICIS.



The COFA

The Closeness of Fit Analysis (COFA) shall provide business rules, comparison reports, information and analyses that will be used to make a decision to integrate AFS into ICIS, or to pursue an alternative means to modernize AFS.



Tasks for the COFA:

- 1. Compilation of Current AFS Business Rules
- 2. Development of Baseline Evaluation Criteria
- 3. Comparison and Analysis of AFS/ICIS Data Fields
- 4. Comparison and Analysis of AFS/ICIS Data Reporting Procedures
- 5. Comparison and Analysis of AFS/ICIS Functionality and Features
- 6. Final Report.



Task 1: Compilation of Current Business Rules

Draft Business Rules have been compiled for:

- •AFS Structure: Plant General, Plant CMS, Plant HPV, Plant Air Program and Pollutant, Plant Actions, Plant History
- Use of National Action Types
- Penalty Policy
- •Compliance Status Alternatives for the Compliance Workgroup review. (Chair: Ahmed Amanulah, EPA R4)

These documents will be provided at the AFS 2003 Workshop for review/comment by the AFS User Community.



User Review of Draft Business Rules:

- 1. Distribution of Draft Business Rules
 Comment Period Begins-July 2003
 Comment Period Ends--September 2003
- 2. Loading Draft Business Rules on EPA Websites-July 2003
- 3. Conference Calls with each Region-August-September 2003
- 4. Finalize AFS Business Rules-October 2003



Comment Period Procedures:

- 1. Any user may comment on the draft Business Rules.
- 2. Comments should be forwarded to the AFS Regional Compliance Manager to be queued for discussion.
- 3. After all comments and discussions are held, a Final Draft will be presented to the AFS Change Configuration Board for final approval.

In the meantime, the COFA proceeds with analysis using draft business rules.



COFA Schedule:

The COFA is scheduled for completion in October 2003.