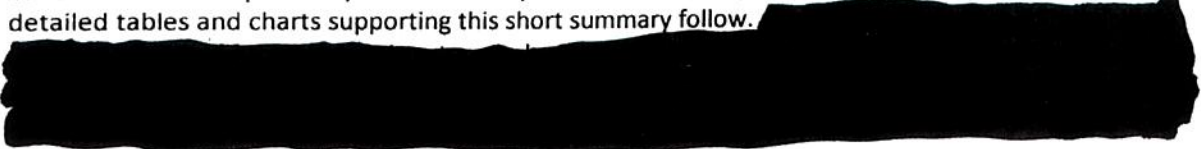


FY17 to FY18 Mid-Year Analysis for Regional Evaluation

6/19/18

PURPOSE

This document provides an in-depth analysis of the changes in enforcement outputs (initiations, conclusions and inspections) between mid-year FY 17 and mid-year FY 18 by programs and region. The detailed tables and charts supporting this short summary follow.



CAVEAT

Regions are expected to enter data into ICIS within 10 business days of the event. The FY17 mid-year data should be of very high quality as the regions had 7 months after March 31, 2017 to complete and certify their data. The FY18 -mid-year data should be of good quality as the regions have had two months to complete data entry after mid-year close (March 31, 2018), but the end of year data certification process that prompts data quality reviews does not occur until October 2018.

INITIATIONS

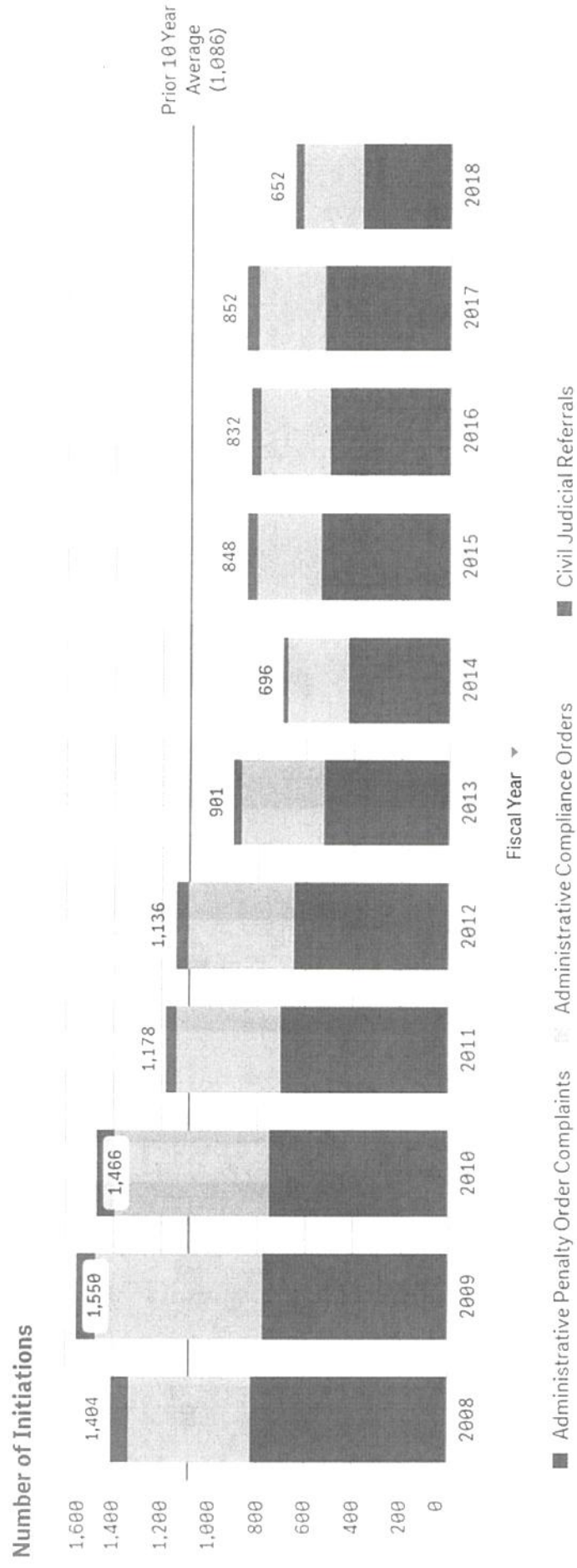
- Between MY FY 17 and MY FY 18, there was a 24% decline in the number of initiations among all programs
- Between MY FY 17 and MY FY 18, every enforcement program had a decline in the number of initiations except SDWA PWS (65% increase).¹
- The major enforcement programs saw declines as follows:
 - o CAA Stationary Source = -52%
 - o CWA NPDES = -36%
 - o RCRA HW = -17%
- From MY FY 17 to MY FY 18, every region had a decline in the number of initiations
 - o Regions 2, 6 and 9 had declines of less than 10%
 - o Regions 3 (40%), 4 (49%), and 8 (53%) had declines of at least 40%
- Overall there was a 28% decline in the number of civil judicial referrals from MY FY 17 to FY 18

CONCLUSIONS

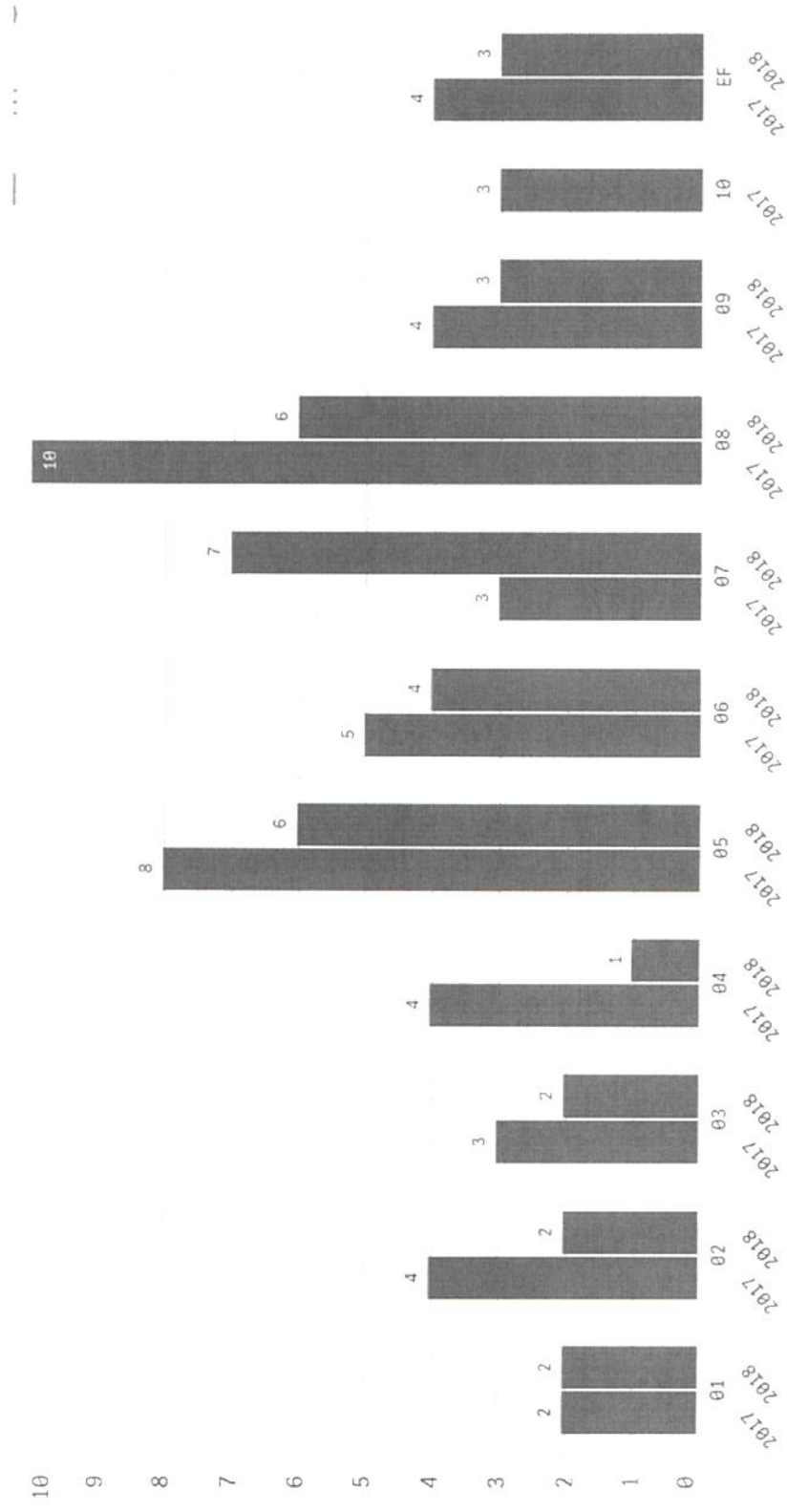
- From MY FY 17 and MY FY 18, there was a 23% decline in conclusions among all programs which we expect would lead to a decline in outcomes, such as penalty dollars, injunctive relief and environmental benefits (assuming there is no surprise huge case).
- From MY FY 17 and MY FY 18, every enforcement program had a decline in conclusions except SDWA PWS (50% increase)
 - o The SDWA PWS increase is not consistent among all regions
- The major enforcement programs saw declines as follows:

¹ There was a slight increase in PWS inspections from FY2016 to FY2017, which may partially explain the increase in enforcement actions in MY FY2108.

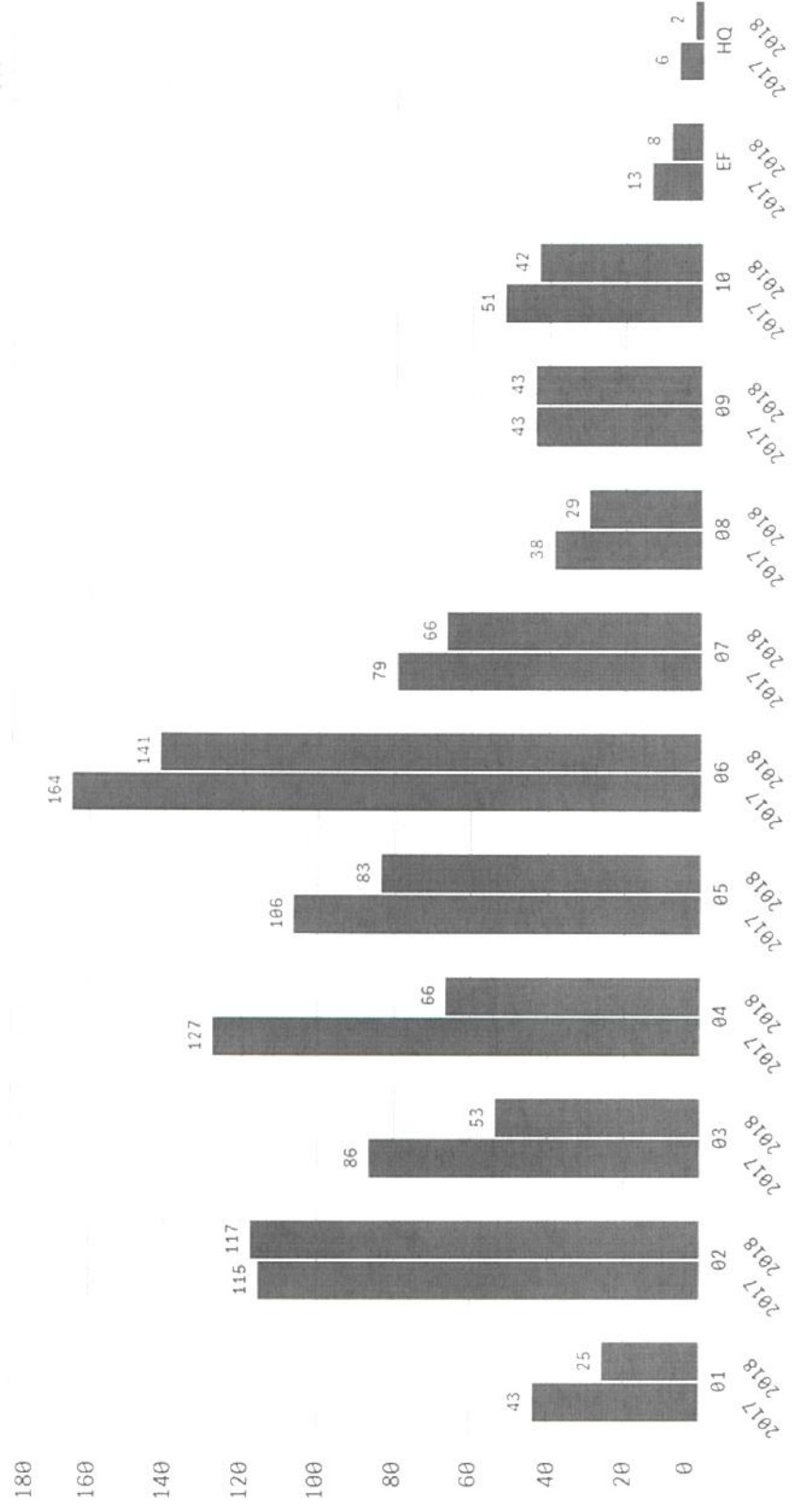
Total Initiations by Year: Mid-Year to Mid-Year Comparison



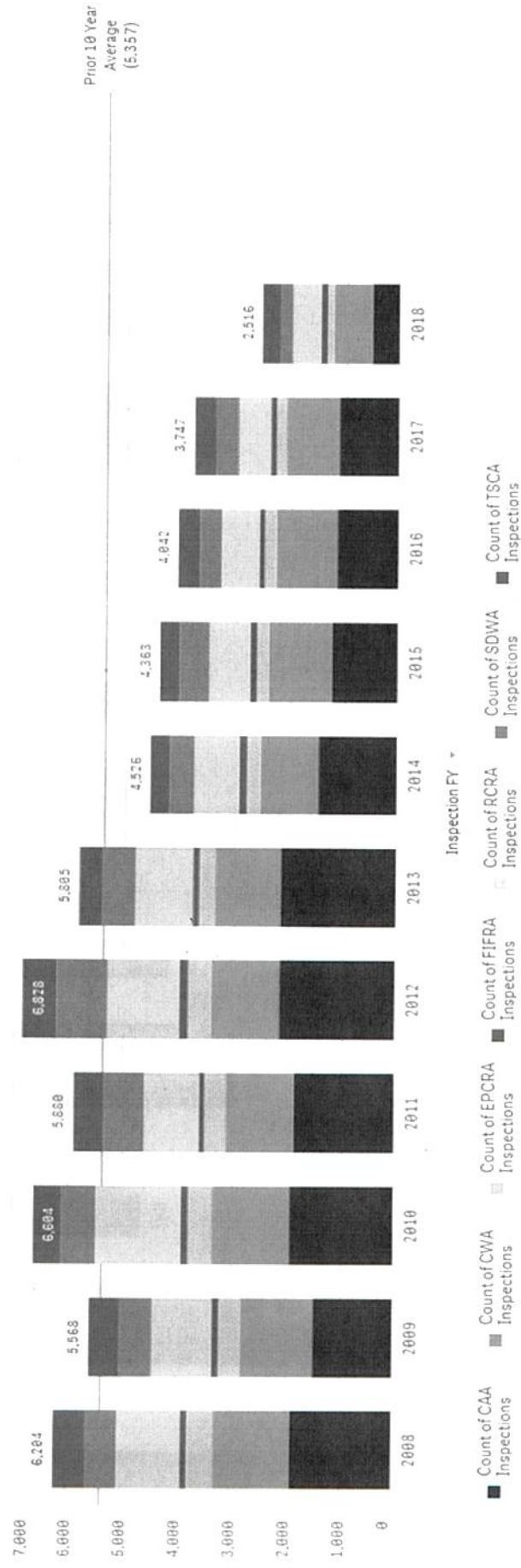
Civil Judicial Referrals by Region: Mid-Year to Mid-Year Comparison



Total Conclusions by Region: Mid-Year to Mid-Year Comparison



Inspections by Year: Mid-Year to Mid-Year Comparison



Inspections by Region: Mid-Year to Mid-Year Comparison

