

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



May 22, 2006

OFFICE OF  
ENFORCEMENT AND  
COMPLIANCE ASSURANCE

MEMORANDUM

**SUBJECT:** Final Single Event Violation Data Entry Guide for the Permit Compliance System (PCS)

**FROM:** David A. Hindin, Director /s/  
Enforcement Targeting, and Data Division (ETDD)

**TO:** Regional Water Branch Chiefs  
Regional Water Enforcement Branch Chiefs

On September 30, 2005, we sent you an Interim Single Event Violation Data Entry Guide for PCS. Single event violations are one-time or long-term violations discovered by the permitting authority typically during inspections (and not through automated reviews of Discharge Monitoring Reports). The attached document is the final version of this Data Entry Guide, which includes changes made in PCS in response to comments received in the last five months, and will serve as the key reference document for tracking these violations in PCS. While none of the changes were major, we updated the Interim Single Event Violation Data Entry Guide to maintain its accuracy regarding several revised codes in the database. To summarize the key steps that have led to this point:

- The list of single event violation codes was revised through a series of meetings and conference calls with States and Regions in Fall 2004. These new codes were added to PCS in March 2006, and we will also include them in the initial release of ICIS-NPDES.
- This subject was presented at the last two PCS National Meetings, in 2004 and 2005, with States and Regions in attendance.
- The Interim Data Entry Guide was discussed on a series of conference calls with EPA Regions in May and June of 2005.
- The Interim Single Event Violation Data Entry Guide for PCS was issued to Regional Water and Enforcement Branch Chiefs for distribution to their States on September 30, 2005.

The Final Single Event Violation Data Entry Guide for PCS includes edits to 11 single event violation codes descriptions, and the deletion of one code. This is reflected in Attachment 1, the Single Event Violation code table. There have also been some

minor corrections to update and reorganize the information provided in Attachment 5, “Entering and Tracking Single Event Violations, Linking Them to Enforcement Actions, and Detecting and Resolving RNC in PCS”. Lastly, the Final Single Event Violation Data Entry Guide for PCS includes the revision of Section 7 “wet weather” violation scenarios to refer to specific universes such as CAFOs, CSOs, SSOs, and Storm Water.

Please note that single event violations are currently a required (WENDB) data element for NPDES major and PL 92-500 (construction grant) non-major facilities in PCS. At facilities whose permits do not require DMRs, single-event violations are the ONLY source of national data regarding violations that are discovered by the permitting authority. The development and distribution of this Data Entry Guide emphasizes the growing importance of maintaining an electronic record of inspection-based violations.

Now that the Single Event Violation Data Entry Guide is final, my Division will be monitoring the entry of single event violations. This is already one of the State Review Framework metrics. For calendar year 2005, we have noticed that only Regions 3, 4, 6, and 8 entered any into PCS. In allocating our resources to manage core programs, it is important that we can demonstrate the outcome of our compliance monitoring investments. Tracking the violations arising from these investments will help us to demonstrate the importance of these activities. We realize that this will be somewhat of a “culture change” for the NPDES program in terms of data entry; however we believe that, with the new violations codes and this Data Entry Guide, any initial difficulties in adjusting to electronic tracking of these violations will be overcome to reveal the advantages of this approach.

Please distribute the attached document to the appropriate Regional and state managers and data entry staff. Any questions may be directed to Amelie Van Den Bos at [vandenbos.amelie@epa.gov](mailto:vandenbos.amelie@epa.gov).

Attachments (1)

cc: Kate Anderson, OCE  
Ken Gigliello, OC  
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PCS Data Stewards

**SINGLE EVENT VIOLATION DATA ENTRY GUIDE FOR THE  
PERMIT COMPLIANCE SYSTEM (PCS)**

May 22, 2006

<u>Table of Contents</u>	<u>Page</u>
1. Introduction	<a href="#">1</a>
2. Background	<a href="#">1</a>
3. Entering a Single Event Violation	<a href="#">2</a>
4. Reportable Non-Compliance/ Significant Non-Compliance (RNC/ SNC) Determination	<a href="#">3</a>
5. Relationship of Single Event Violations to Quarterly Non-Compliance Report (QNCR) and Enforcement and Compliance History Online (ECHO)	<a href="#">3</a>
6. Traditional Program and Pretreatment Scenarios for DMR-submitting Facilities	<a href="#">6</a>
7. Violation Tracking for CAFOs, CSOs, SSOs, and Storm Water	<a href="#">9</a>

*Attachments:*

- [1](#) - Available Single Event Violation codes
- [2](#) - Available RNC Detection codes
- [3](#) - Available RNC Resolution codes
- [4](#) - Available QNCR Status codes
- [5](#) - Entering and Tracking Single Event Violations, Linking Them to Enforcement Actions, and Detecting and Resolving RNC in PCS

## **1. Introduction**

Single event violations are violations of the CWA's NPDES requirements that are documented during a compliance inspection, reported by the facility, or determined through other compliance monitoring methods by the permitting authority. Examples of single event violations include failure to obtain required permit, sampling wastewater in an unauthorized location, or an unauthorized wastewater bypass or discharge. Single event violations do not include violations generated automatically by either PCS or ICIS (e.g., effluent limit violation from a DMR, or compliance schedule violations).

Single event violations include one-time events and long-term violations. Single-event violations are used by EPA to maintain and report the compliance status of a facility for violations that are not automatically flagged by the database. Methods of detection of single event violations include inspections, information collection requests, state/tribal referrals, DMR comments, annual reports, non-compliance reports, and other reports required under the permit, enforcement order, or regulation, facility self-audits, and citizen complaints. In the case of unpermitted facilities, single event violations may be entered in response to violations of CWA NPDES regulations. In certain cases, single event violations may also include violations of the NPDES permit or an enforcement order. The data are critical to forming an historical record of inspection findings and compliance determinations that are made by the NPDES permitting authority.

Single Event Violations are required to be entered into the national Permit Compliance System (PCS) as defined in the Water Enforcement National DataBase (WENDB list) for NPDES major and PL 92-500 non-major permittees. EPA strongly encourages the entry of single-event violations at non-major facilities; however, at this time, there is no requirement for such entry. The purpose of this document is to provide guidance and clarification on the data entry and use of Single Event Violations in PCS so that the data elements are maintained in a nationally consistent way. Regions and states that are entering data into the single-event fields of PCS should follow this Guide.

## **2. Background**

Violation tracking is important because it creates an historic electronic record of inspection or compliance monitoring findings. Tracking inspection results can impact future enforcement decisions, particularly when a permittee continues to exhibit the same violation over the course of several years. Repeat violations may lead the permitting authority to escalate or reclassify the violation (e.g. by designating Reportable Non-Compliance or Significant Non-Compliance). Electronic documentation of violations also improves the accuracy of public information, particularly since the lack of any violations in the system is normally interpreted as full compliance by the database user.

To harmonize the tracking of single-event violations with the violations and program areas that are of most importance to the NPDES program, EPA has taken several steps to improve reporting and tracking. First, the original list of single-event codes were re-designed to remove redundancies and to match more closely to program priority areas (see Attachment 1 for the list). Secondly, this guide has been prepared to offer practical

examples on how the data should be maintained in the system. The authorized permitting authority should consult the list of reportable single-event violations (Attachment 1), and enter any listed violation that is determined through inspections, review of self-reported information, or other means of discovery. If the permitting authority has the need to track additional violations beyond those listed on the table, the system provides the flexibility to enter an “other violation” code, which can be augmented with comment field narrative.

### **3. Entering a Single Event Violation**

Single Event Violations must be entered manually (manually means the system does not automatically generate the violation using DMR information) by staff at the appropriate permitting authority. To enter a Single Event Violation into PCS, the permitting authority (i.e., region, state, tribe) needs to identify the following—

- Either the specific permit that is being violated (i.e., NPDES ID) or, in the case where there is no permit, the violating facility or site (i.e., Unpermitted ID)
- The type of the violation (Attachment 1 provides a list of codes and definitions)
- The date on which the violation occurred or, if this is not available, date on which the violation was discovered (i.e., Violation Date).

This is the minimum information required to enter a Single Event Violation for a specific permit in PCS. This can be accomplished through either batch or online (i.e., Web) data entry. These data elements in combination form a unique key by which the Single Event Violation can later be identified and retrieved in PCS.

OECA recommends that single-event violations discovered by the permitting authority and listed on the single-event violation table should be:

- (1) tracked as a single event violation,
- (2) linked to the inspection if applicable,
- (3) if a quarterly non-compliance status is needed, placed in RNC or SNC (by entering an RNC detection code - see Attachment 2 - that will trigger “reportable noncompliance”), and
- (4) resolved (pending) with either a formal enforcement action or penalty order (linked to the violation), and a compliance schedule (if appropriate).

*Note: If the violation is entered for tracking purposes and will not receive action, steps 3 and 4 are not necessary.*

### **4. Reportable Non-Compliance/ Significant Non-Compliance (RNC/ SNC) Determination**

Should the region, state, or tribe determine that the Single Event Violation merits classification as RNC or SNC (e.g. meeting SNC definition), the RNC Detection Code/Date (see Attachment 2) should be entered. Once an enforcement action has been

taken, the RNC Resolution Code/Date (see Attachment 3) can be entered manually or automatically as a result of linking that Single Event Violation to a formal Enforcement Action Final Order that includes a Compliance Schedule. For more technical details, please see Attachment 5.

#### **5. Relationship of Single Event Violations to Quarterly Non-Compliance Report (QNCR) and Enforcement and Compliance History Online (ECHO)**

The following statements apply to QNCR processing and single event violation tracking in PCS:

- facilities with any permit violation during a quarter are considered in violation
- the “QNCR Status” field (see Attachment 4 for codes) is used in PCS to track the quarterly non-compliance status for both major and non-major permits; however, only major facilities with RNC or SNC-level violations will make the QNCR
- non-major facilities that have violations will not go on the QNCR, (unless the permitting authority re-designates the facility as a major); however, the facility-level noncompliance status will be publicly available (via FOIA or web site such as ECHO)

The PCS Quality Assurance Guidance Manual states that single event violations should be entered into PCS within 5 working days of notification of the violation event. If this does not happen, and an RNC or SNC level single event violation is entered retroactively after the quarter has been analyzed by PCS for RNC/SNC determination, then the user will be expected to manually populate the facility level QNCR status values with either N or E as appropriate for that quarter (see Attachment 4), in addition to the RNC detection and resolution codes.

The table below describes the most common PCS data entry progression as it relates to the violation review process outlined in the Enforcement Management System (EMS). All data entry should be done according to the targets for data quality set forth in the PCS Quality Assurance Guidance Manual.

Table 1. Data Progression Example 1

	<b>Activity Performed</b>	<b>PCS Data Entry</b>	<b>In Violation</b>	<b>In SNC</b>
<b>A</b>	Compliance Monitoring	Enter Inspection	-	-
<b>B</b>	Non-Compliance Determined	Enter appropriate Single Event Violation(s) and link to Inspection record	Yes	No
<b>C</b>	SNC Determined	Add appropriate RNC Detection and Resolution Code to Violation record	Yes	Pending system-generated RNC/ SNC Status
<b>D</b>	Notice of Violation (NOV) sent	Add Enforcement Action Code and link to Violation record	Yes	Pending system-generated RNC/ SNC Status
<b>E</b>	RNC/SNC Processing	System-generated. No data entry required.	Yes	Yes
<b>F</b>	SNC Addressed with Formal Enforcement Action and Compliance Schedule	Enter Formal Enforcement Action and Compliance Schedule, and link to Violation for automatic RNC/SNC resolution	Yes	System-generated "Resolved Pending" status
<b>G</b>	Completion of Compliance Schedule	Complete schedule, close out action, and put end date on single event violation	No	No

Another variation on this progression is presented in the following table, where a facility returns to compliance before it is designated in SNC.

Table 2. Data Progression Example 2

	<b>Activity Performed</b>	<b>PCS Data Entry</b>	<b>In Violation</b>	<b>In SNC</b>
<b>A</b>	Compliance Monitoring	Enter Unpermitted Facility data	-	-
<b>B</b>	Non-Compliance Determined	Enter appropriate Single Event Violation(s) “Failure to Apply for a Permit”	Yes	No
<b>C</b>	SNC Determined	Add appropriate RNC Detection and Resolution Code to Violation record	Yes	Pending system-generated RNC/ SNC Status
<b>D</b>	Notice of Violation (NOV) sent	Add Enforcement Action Code and link to Violation record	Yes	Pending system-generated RNC/ SNC Status
Facility applies for a permit 30 days later.				
<b>E</b>	Permit Application	Enter Permit application data and link to Unpermitted Facility	-	-
<b>F</b>	Non-compliance Resolved	Put end date on single event violation for unpermitted facility and add manual RNC Resolution Code	No	Pending system-generated RNC/ SNC Status
<b>G</b>	RNC/ SNC Processing at Unpermitted Facility	System-generated. No data entry required.	No	System-generated “Resolved” status

The following scenarios demonstrate how PCS should be used to document a complete and consistent set of “pipeline” data (inspection, violation type/duration, action) that is necessary for inspection-driven programs. For “actionable” single event violations, authorized programs should use SNC designations consistent with the EMS. All scenarios assume timely data entry according to the standards set forth in the PCS Quality Assurance Guidance Manual.

**6. Traditional Program and Pretreatment Scenarios for DMR-submitting Facilities**  
(practices for facilities that have automatic QNCR generation - major or non-major standard permits)

**Scenario 1 - Violation found via inspection at facility that submits DMRs - action required.**

**Facts:** On 1/1/05, state determines that sampling has been improperly conducted since 9/1/04, which produces DMRs that are not correct. State determines that detected violation has “masked” true SNC. Facility agrees to fix problem for future quarters beginning in the April 2005 quarter. Formal administrative enforcement action is completed on 5/1/05.

**PCS Data Entry:** After the 1/1/05 inspection (INSP, INMY) is completed, the permitting authority enters the SEV (SVCD) and selects 9/1/04 as the violation date (SVDT). *[Note that by entering the violation date as 9/1/04, this assumes the agency wants to “backdate” the violation to when it started.]* The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violations were discovered through an inspection. Although the single-event violation date is recorded as 9/1/04, the RNC detection code (SNCS) is entered with the detection date (SNDS) of 1/1/05. RNC entry will trigger SNC (QNCR status code=E) in the Jan-Mar reporting quarter. State takes a formal enforcement action (ENAC) on 5/1/05 (ENDT) and links the action to the single-event violation using EVTP/EVSC/EVSD fields in the enforcement action key record. RNC may be manually resolved (SRCS) with a date of 5/1/05 (SRDS) and the enforcement action should be closed. If the enforcement action includes a response due from the facility that corrective measures have been taken, a compliance schedule (EVNT, DTSC) can be entered to resolve the SNC. The user enters compliance schedule code “compliance with final event” (62099), which moves the facility into “Resolved pending” until the enforcement action is closed (with ENST=CL and ESDT).

**Scenario 2 - One time significant and preventable spill at major occurs with fishkill.**

**Facts:** Facility operator error causes spill on 1/1/05. Region determines spill is significant and that a penalty order is needed on 3/1/05. No injunctive relief was needed.

**PCS Data Entry:** SEV code (SVCD) and date (SVDT) of 1/1/05 is entered. RNC Code (SNCS="J") entered indicating "unpermitted discharge" (other codes are available for different situations) that will trigger SNC (QNCR status code=E) in that quarter. The RNC detection date (SNDS) corresponds to the date that EPA first found out about the spill. Penalty order (ENAC) on 3/1/05 (ENDT) is entered and tied to SEV in system using EVTP/EVSC/EVSD fields in the enforcement action key record. Since penalty actions don't resolve SNC, the agency would manually resolve SNC by adding a resolution code (SRCS) and date (SRDS) of 3/1/05. Penalty order is closed out with status ENST=CL and date (ESDT).

*Note: If injunctive relief was needed, a formal action with extended compliance would be entered in addition to the penalty order.*

**Scenario 3 - Multiple spills that are actionable are determined during facility audit or review of files.**

**Facts:** 150 spills are determined through a file review.

**PCS Data Entry:** After the 1/1/05 inspection (INSP, INMY) is completed, agencies should enter two SEV "D0017" code entries for "Violation specified in comment", with SVDT dates corresponding to the dates of the first and last spill. The code "INS" may be entered into the SEV user-defined field RDS1 to indicate if the violations were discovered through an inspection and the SEV user-defined field RDS2 may be used to indicate "first spill" and "last spill" with the number of spills written afterwards. If appropriate, both SEVs would have RNC detection codes (SNCS).

*Note: Ideally, EPA recommends that all reported spills are entered into the system as they occur. This data will demonstrate a pattern of non-compliance which should be a factor in determining whether to take an enforcement action and what type of action to take. However, if this is not possible, we recommend "backdating" the noncompliance. In cases where the true detection date for the violation is not known, the earliest available date of discovery (e.g. inspection, data entry) should be used.*

**Scenario 4 - Minor violations found at facility requiring follow-up with 308 letter, but no action.**

**Facts:** Violations found on 1/1/05. On 2/1/05, inspector sends 308 letter to obtain more information in order to make a RNC determination. Response is due on 3/1/05, and inspector receives response to letter on 2/15/05. No formal action taken.

**PCS Data Entry:** SEV code (SVCD) and date (SVDT) of 1/1/05 entered. 308 letter should be recorded as enforcement action code (ENAC=10) with date (ENDT) of 2/1/05, and linked to SEV using EVTP/EVSC/EVSD fields in the enforcement action key record. Response due date (ERDT) should be entered as 3/1/05, with response received date (EADR) of 2/15/05. System will not automatically track need for report by 3/1, however this information should be entered for purposes of data completeness.

**Scenario 5 - Pretreatment Violation Tracked to Resolution with No Action Needed.**

**Facts:** The EPA Region is the control authority for a state in which an inspector finds a categorical industrial user (CIU) discharging to a publicly-owned treatment works (POTW) without an approved pretreatment program and not reporting as required under federal regulations, on 1/1/05. The reporting violation is corrected and verified (without inspection) on 3/1/05, no enforcement action needed.

**PCS Data Entry:** Create a record by entering pertinent facility and address WENDB data elements as required by the system (i.e., NPID, FNMS, SIC2, CFRC, RNAM, RCTY, RSTT, RTEL, RZIP). Enter system-required violation code (SVCD) and date (SVDT) of 1/1/05. The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violation was discovered through an inspection. RNC detection code (SNCS) and date (SNDS) left blank.

**Scenario 6 - Tracking a facility in PCS as a known Categorical Industrial User, i.e., already is being tracked in PCS.**

**Facts:** During a Pretreatment inspection an inspector finds violations on 1/1/05 for failure to submit Periodic Compliance Reports (PCR), not monitoring for all the required pollutants, not applying right standards, or sampling methods. Agency decides on 2/1/05 that violations are serious and action is required. Formal administrative action is taken on 3/1/05. The CIU submits the reports and corrects all the violations on 3/31/05.

**PCS Data Entry:** Enter violation code(s) (SVCD) and date(s) (SVDT) of 1/1/05 for each single event violation. The code “INS” may be entered into

the SEV user-defined field (RDS1) to indicate that the violation(s) was discovered through an inspection. On 2/1/05, manually enter RNC detection code(s) (SNCS) “Q” (see Attachment 2) and dates (SNDS) of “02/01/05”. Enter formal action (ENAC) on 3/1/05 (ENDT), enforcement action file number (ERFN), and tie the action to the single event violation(s), using EVTP/EVSC/EVSD fields in the enforcement action key record. Extended compliance schedule with compliance milestone (EVNT) and compliance schedule file number (CSFN) is entered indicating reports and corrective actions must be implemented and received by 3/31/05 (DTSC). Single event violations automatically become “resolved pending” (SRCS) due to entry and linkage of the formal enforcement action. After compliance with the enforcement action is achieved, it is closed out (ENST=CL & ESDT=03/31/05). Single event violations are automatically resolved with closeout of formal enforcement action and compliance schedule is completed using DTAC/DTRC.

## **7. Violation Tracking for CAFOs, CSOs, SSOs, and Storm Water**

“Wet weather” regulated entities refer collectively to storm water runoff, discharges from concentrated animal feeding operations (CAFOs), combined sewer overflows (CSOs), and sanitary sewer overflows (SSOs) that are regulated under the Clean Water Act (CWA), 33 U.S.C. §§ 1251 *et seq.*, and the National Pollutant Discharge Elimination (NPDES) Program, under CWA § 1342. Frequently – but not always – discharges of pollutants from these operations are related to weather events. The discharges can be non-weather related as well, *e.g.*, illegal dry weather overflows from combined and sanitary sewer systems. Because many of the point sources in these four program areas do not meet the definition of NPDES “major”, SNC does not currently apply. However, this guide provides a framework for how the permitting authority can use PCS to track these violations. As part of its effort to update the NPDES program, EPA – in close consultation with the states – is currently developing supplemental national enforcement guidance to identify, prioritize, and track significant non-compliance (SNC) in the CAFOs, CSOs, SSOs, and Storm Water program areas. When this effort is completed, these scenarios will be updated to reflect the new policy.

There may be some situations at Wet Weather facilities when the violation is considered SNC-level AND there is an appropriate RNC/SNC code combination (see Attachments 2 and 3). In these situations, the authorized program could choose to make an SNC designation. When a single event violation occurs that will not be enforced against, OECA recommends that the permitting authority track this as a single event violation, but a RNC detection code is not needed. Entry of the single event violation will ensure an accurate database record, and will make EPA’s public access site reflect the inspection results.

*Note: All scenarios assume no other violation.*

**Scenario 7 - Violation Tracked to Resolution with No Action Needed.**

**Facts:** Inspector finds violation on 1/1/05. Violation is corrected and verified (without inspection) on 3/1/05, no enforcement action needed.

**PCS Data Entry:** Violation code (SVCD) and date (SVDT) of 1/1/05 entered (system required). The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violation was discovered through an inspection. RNC detection code (SNCS) and date (SNDS) left blank.

**Scenario 8 - Violation detected with need for formal action.**

**Facts:** Inspector finds a violation on 1/1/05 for failure to submit report. On 2/1/05, agency decides that violations are serious and action is required. Formal administrative action taken on 3/1/05. Facility submits report on 3/30/05.

**PCS Data Entry:** Violation code (SVCD) and date (SVDT) of 1/1/05 entered (system required). The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violation was discovered through an inspection. On 2/1/05, RNC detection code (SNCS) “F” (see Attachment 2) and date (SNDS) is entered indicating violations will trigger RNC (QNCR status code=N). Formal action (ENAC) tied to single event violation on 3/1/05 (ENDT), using EVTP/EVSC/EVSD fields in the enforcement action key record. Compliance schedule milestone (EVNT) is entered indicating report must be received by 3/30/05 (DTSC). On 3/30/05 (ESDT), the enforcement action is closed out (ENST=CL), resulting in RNC resolution (SRCS) for this violation. Compliance schedule is completed using DTAC/DTRC.

**Scenario 9 - Violation is detected and then corrected before a penalty order is taken.**

**Facts:** Same scenario as #2, except penalty action is chosen, and facility returns to compliance on 2/1/05 (before the penalty action is taken).

**PCS Data Entry:** Violation code (SVCD) and date (SVDT) of 1/1/05 entered (system required). The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violation was discovered through an inspection. Penalty action (ENAC) on 3/1/05 (ENDT), and tied to single event violation using EVTP/EVSC/EVSD fields in the enforcement action key record. Penalty order is closed out with status ENST=CL and date (ESDT). User Option A - RNC detection code (SNCS) is not entered since the agency decided an administrative action was not needed. User Option B - alternatively, the user could enter an RNC detection code (SNCS) and then manually resolve it (with SRCS/SRDS) if at the time they made the

determination they were unsure whether an administrative or penalty action would be taken.

**Scenario 10 - Multiple violations discovered during facility inspection, action taken, long-term compliance schedule established.**

**Facts:** Violations detected on 1/1/05 and still continuing. State takes formal action against facility on 3/1/05 and puts the facility on a compliance schedule.

**PCS Data Entry:** Violation codes (SVCD) and dates (SVDT) of 1/1/05 entered (system required). The code “INS” may be entered into the SEV user-defined field (RDS1) to indicate that the violations were discovered through an inspection. RNC codes (SNCS) and detection dates (SNDS) of 1/1/05 entered. User enters enforcement action code (ENAC) and date (ENDT) of 3/1/05, and enters a compliance schedule (EVNT) on 6/1/05 (DTSC). Both are linked to the SEV records, using EVTP/EVSC/EVSD fields in the enforcement action key record. This puts the facility into the Resolved Pending category from January until the enforcement action is closed with activity status “CLS”. The compliance schedule actual/achieved dates are entered to complete the schedule. Individual SEVs may be manually resolved (SRCS, SRDS); this does not affect the facility quarterly non-compliance status code, which will be “resolved pending”.

## Attachment 1 - Available Single Event Violation codes

The codes and descriptions listed here may change slightly over time. Please consult PCS system documentation (Table 550) and ICIS-NPDES for updated lists.

Code	Description	Definition
A0018	Effluent Violations - Approved Bypass	
A0013	Effluent Violations - Failed Toxicity Test	
A0023	Effluent Violations - Industrial Spill	
A0017	Effluent Violations - Inspection sample above historic DMR range	
A0022	Effluent Violations - Narrative Effluent Violation	visible sheen/ scum/ floatables
A0012	Effluent Violations - Numeric effluent violation	
A0016	Effluent Violations - Reported Fish Kill	
A0011	Effluent Violations - Unapproved Bypass	
A0015	Effluent Violations - Unauthorized Discharge of Brine	
B0019	Management Practice Violations - Best Management Practice Deficiencies	
B0024	Management Practice Violations - Biosolids/Sewage Sludge Violation (Part 503)	
B0026	Management Practice Violations - Failure to Allow Entry	
B0012	Management Practice Violations - Failure to Conduct Inspections	
B0027	Management Practice Violations - Failure to Develop Adequate SPCC Plan	
B0017	Management Practice Violations - Failure to develop any or adequate SWPPP/SWMP	Includes Failure to revise SWMP to meet MEP
B0011	Management Practice Violations - Failure to Develop/Enforce Standards	
B0028	Management Practice Violations - Failure to Implement SPCC Plan	
B0018	Management Practice Violations - Failure to Implement SWPPP/SWMP	Includes failure to control contributing sources.
B0041	Management Practice Violations - Failure to Maintain Records	
B0040	Management Practice Violations - Improper Chemical Handling	
B0023	Management Practice Violations - Improper Land Application (non-503, non-CAFO)	
B0020	Management Practice Violations - Improper Operation and Maintenance	
B0025	Management Practice Violations - Inflow/Infiltration (I/I)	
B0021	Management Practice Violations - Laboratory Not Certified	
B0022	Management Practice Violations - No Licensed/Certified Operator	
B0042	Management Practice Violations - Violation of a milestone in an order	
C0017	Monitoring Violations - Analysis not Conducted	
C0011	Monitoring Violations - Failure to Monitor for non-Toxicity Requirements	
C0021	Monitoring Violations - Failure to Monitor for Toxicity Requirements	
C0015	Monitoring Violations - Frequency of Sampling Violation	

<b>Code</b>	<b>Description</b>	<b>Definition</b>
C0018	Monitoring Violations - Improper Analysis or Lab Error	
C0014	Monitoring Violations - Invalid/Unrepresentative Sample	
C0016	Monitoring Violations - No Flow Measurement Device	
D0014	Permitting Violations - Application Incomplete	
D0011	Permitting Violations - Discharge Without a Valid Permit	
D0012	Permitting Violations - Failure to submit required permit application information	This is a CWA §308 violation.
D0015	Permitting Violations - Failure to Pay Fees	
D0016	Permitting Violations - Failure to Submit Timely Permit Renewal Application	
D0013	Permitting Violations - Unapproved Operation	
D0017	Permitting Violations - Violation Specified in Comment	
C0012	Pretreatment - Baseline Monitoring Report Violation	
B0P12	Pretreatment - Failure to Conduct Inspections	
B0P11	Pretreatment - Failure to Develop/Enforce Standards	
B0013	Pretreatment - Failure to Enforce Against I/U	
B0015	Pretreatment - Failure to Establish Local Limits	
C0013	Pretreatment - Failure to Establish Self-Monitoring Requirements	
B0014	Pretreatment - Failure to Issue SIU Permits	
B0016	Pretreatment - Failure to Meet Inspection and Sampling Plan for SIUs	
E0015	Pretreatment - Failure to submit required report (non-DMR)	
B0P40	Pretreatment - Improper Chemical Handling	
A0014	Pretreatment - IU Violation of Pretreatment Standards	
E0017	Reporting Violations - Failure to Notify	
E0012	Reporting Violations - Failure to Submit DMRs	
E0016	Reporting Violations - Failure to submit required report (non-DMR, non-pretreatment)	
E0013	Reporting Violations - Improper/ Incorrect Reporting	
E0011	Reporting Violations - Late Submittal of DMRs	
E0014	Reporting Violations - Noncompliance with Section 308 Information Request	
B0A19	WW CAFO - Best Management Practice Deficiencies	
B0038	WW CAFO - Direct Animal Contact with Waters of US	
D0A11	WW CAFO - Discharge without a permit	
B0A12	WW CAFO - Failure to Conduct Self-Inspections	should include only self-inspections that are NOT date based
B0032	WW CAFO - Failure to Develop or update NMP	
B0033	WW CAFO - Deficiencies in Implementing the NMP/ permit	

<b>Code</b>	<b>Description</b>	<b>Definition</b>
B0A41	WW CAFO - Failure to Maintain Records or Meet Record Keeping Requirements	includes SNC criteria “failure to meet record keeping requirements”
B0043	WW CAFO - Failure to inform permitting authority of significant NMP changes	
C0A11	WW CAFO - Failure to Monitor	
D0A12	WW CAFO - Failure to submit required permit application or identifying information	This is a CWA §308 violation.
C0019	WW CAFO - Failure to Test Manure or Soil, as required	
B0A40	WW CAFO - Improper Chemical Handling	
B0A23	WW CAFO - Failure to implement land application BMPs, not including buffers/ setbacks	
B0039	WW CAFO - Improper Waste Management (not including land application)	
B0037	WW CAFO - Improper Mortality Management	
B0036	WW CAFO - Improper O&M	
E0A13	WW CAFO - Improper/Incorrect reporting	
B0034	WW CAFO - Insufficient Buffers/Setbacks	
B0035	WW CAFO - Insufficient Storage Capacity	
A0A22	WW CAFO - Narrative effluent violation	
E0A16	WW CAFO - No Annual or Other Required Report Submitted	
C0020	WW CAFO - No Depth Marker in Storage Pond	
E0A14	WW CAFO - Noncompliance with section 308 Information Request	
A0A12	WW CAFO - Numeric effluent violation	Alternative technology
A0019	WW CAFO - Production Area Runoff	
B0A42	WW CAFO - Violation of a milestone or final compliance date in an order	
A0C18	WW CSO - Approved Bypass	As stated in 40 CFR 122.41(m)(1)(i), a bypass means the intentional diversion of waste streams from any portion of a treatment facility. In CSO systems, therefore, a bypass can only occur after the headworks of a treatment plant.
A0024	WW CSO - Dry weather overflow	For CSOs, Any unauthorized overflow from combined sewage systems only during dry weather
B0030	WW CSO - Failure to Develop or Submit Adequate Long Term Control Plan (LTCP)	
B0031	WW CSO - Failure to Implement Long Term Control Plan (LTCP)	
B0029	WW CSO - Failure to Implement Nine Minimum Controls (NMCs)	
BC291	WW CSO - Failure to implement required NMC #1(Proper operation and maintenance)	
BC292	WW CSO - Failure to implement required NMC #2 (Maximum use of the collection system)	

<b>Code</b>	<b>Description</b>	<b>Definition</b>
BC293	WW CSO - Failure to implement required NMC #3 (Review pretreatment requirements)	Includes failure to prevent IU discharges from CSO discharge without requiring appropriate IU pretreatment or storage.
BC294	WW CSO - Failure to implement required NMC #4 (Maximization of flow)	
BC295	WW CSO - Failure to implement required NMC #5 (Elimination of dry weather flow)	includes failure to implement controls to prevent dry weather overflows but should not include actual dry weather overflows
BC296	WW CSO - Failure to implement required NMC #6 (Control of solids)	Includes floatables
BC297	WW CSO - Failure to implement required NMC #7 (Pollution prevention programs)	
BC298	WW CSO - Failure to implement required NMC #8 (Public notification)	
BC299	WW CSO - Failure to implement required NMC #9 (Monitoring)	
B0C41	WW CSO - Failure to Maintain Records or Meet Record Keeping Requirements	
C0C11	WW CSO - Failure to monitor	
E0C16	WW CSO - Failure to submit required report (non-DMR)	
E0C13	WW CSO - Improper/Incorrect reporting	
B0044	WW CSO - LTCP implementation schedule milestone missed	
A0C22	WW CSO - Narrative effluent violation	Such language is usually found in the "boilerplate" of the permit. For example, such narratives may say no discharge causing or contributing to an exceedance of a State water quality standard, no floatables, no discharge in toxic amounts, discharge must be free from odor, etc.
E0C14	WW CSO - Noncompliance with section 308 Information Request	
A0C12	WW CSO - Numeric effluent violation	This should be used only when there is a specific numeric effluent limitation for this outfall in the permit.
A0C11	WW CSO - Related Unapproved Bypass	As stated in 40 CFR 122.41(m)(1)(i), a bypass means the intentional diversion of waste streams from any portion of a treatment facility. In CSO systems, therefore, a bypass can only occur after the headworks of a treatment plant.

<b>Code</b>	<b>Description</b>	<b>Definition</b>
A0021	WW CSO - Unauthorized CSO Discharge to Waters/Wet Weather	For CSOs, any unauthorized discharge from combined sewer including unauthorized discharges from CSO regulators (i.e. failure to maximize flow to WWTP), or unauthorized discharges from other locations (e.g., manhole covers, pump stations). In CSO systems, these discharges can only occur before the headworks of a treatment plant. Include in the comments field the number of events and estimated total volume per reporting period.
A0025	WW CSO - Operation and maintenance (O&M) violations resulting in unauthorized sewage spills or overflows to dry land or building backup	Does not include dry weather overflows. Include in the comments field the number of events and estimated total volume per reporting period.
B0045	WW CSO - Violation of a milestone in a permit	
B0C42	WW CSO - Violation of a milestone in an order	
A0S18	WW SSO - Approved Bypass	As stated in 40 CFR 122.41(m)(1)(i), a bypass means the intentional diversion of waste streams from any portion of a treatment facility.
A0020	WW SSO - Discharge to Waters	Include in the comments field the number of events and estimated volume per reporting period
D0S11	WW SSO - Discharge without a valid permit (includes satellite systems)	
B0S41	WW SSO - Failure to Maintain Records or Meet Record Keeping Requirements	
C0S11	WW SSO - Failure to monitor	
E0018	WW SSO - Failure to report other violation	Includes §122.41(l)(6) violations for failure to report any SSO spill except those violations that may endanger public health §122.41(l)(7).
E0019	WW SSO - Failure to report violation that may endanger public health 122.41(l)(7)	Exclude §122.41(l)(6) violations.
D0S12	WW SSO - Failure to submit required permit application info (includes satellite systems)	This is a CWA §308 violation and applies to any facility discharging SSOs without a permit application per 40 CFR 122.21.

<b>Code</b>	<b>Description</b>	<b>Definition</b>
B0S20	WW SSO - Improper Operation and Maintenance	Frequent sewage spills (including those to dry land) may be indicative of improper operation and maintenance. Includes failure to develop and implement CMOM program, if required.
A0S22	WW SSO - Narrative effluent violation	Such language is usually found in the "boilerplate" of the permit. For example, such narratives may say no discharge causing or contributing to an exceedance of a State water quality standard, no floatables, no discharge in toxic amounts, discharge must be free from odor, etc.
E0S14	WW SSO - Noncompliance with section 308 Information Request	
A0S12	WW SSO - Numeric effluent violation	
A0026	WW SSO - Overflow to Dry Land or Building Backup	Frequent sewage spills (including those to dry land) may be indicative of improper operation and maintenance. Include in the comments the number of events and estimated total volume per reporting period.
A0S11	WW SSO - Related Unapproved Bypass	As stated in 40 CFR 122.41(m)(1)(i), a bypass means the intentional diversion of waste streams from any portion of a treatment facility.
BS42A	WW SSO - Violation of milestone in an administrative order	
BS42J	WW SSO - Violation of milestone in judicial decree	
B0046	WW SSO - Violation of sewer moratorium or restriction	May also be a violation of 40 CFR 122.41(c) or (d).
D0R11	WW Storm Water Construction - Discharge without a permit	No permit
D0R18	WW Storm Water Construction - Failure to apply for a notice of termination	Failure to submit Notice of Termination
B0R12	WW Storm Water Construction - Failure to Conduct Inspections	
B0C17	WW Storm Water Construction - Failure to develop any or adequate SWPPP/SWMP	
B0C18	WW Storm Water Construction - Failure to Implement SWPPP/SWMP	
B0R41	WW Storm Water Construction - Failure to Maintain Records	
C0R11	WW Storm Water Construction - Failure to Monitor	Where required by permit
BR19A	WW Storm Water Construction - Failure to properly install/implement BMPs	
BR19B	WW Storm Water Construction - Failure to properly operate and maintain BMPs	

<b>Code</b>	<b>Description</b>	<b>Definition</b>
D0R12	WW Storm Water Construction - Failure to submit required permit application information	This is a CWA §308 violation.
E0R16	WW Storm Water Construction - Failure to submit required report (non-DMR)	Where required by permit
A0R22	WW Storm Water Construction - Narrative effluent violation	Where required by permit
E0R14	WW Storm Water Construction - Noncompliance with section 308 Information Request	
A0R12	WW Storm Water Construction - Numeric Effluent Violation	Where required by permit
B0R42	WW Storm Water Construction - Violation of a milestone in an order	
D0M11	WW Storm Water MS4 - Discharge without a permit	
B0M12	WW Storm Water MS4 - Failure to Conduct Inspections	
B0M17	WW Storm Water MS4 - Failure to develop any or adequate SWPPP/SWMP	
B0M18	WW Storm Water MS4 - Failure to Implement SWPPP/SWMP	Includes failure to adequately implement all or any part of SWMP
B0M41	WW Storm Water MS4 - Failure to Maintain Records or Meet Record Keeping Requirements	
C0M11	WW Storm Water MS4 - Failure to Monitor	
BM19A	WW Storm Water MS4 - Failure to properly install/implement BMPs	Refers to structural controls
BM19B	WW Storm Water MS4 - Failure to properly operate and maintain BMPs	Refers to structural controls
D0M12	WW Storm Water MS4 - Failure to submit required permit application information	This is a CWA §308 violation.
E0M16	WW Storm Water MS4 - Failure to submit required report (non-DMR)	
A0M22	WW Storm Water MS4 - Narrative effluent violation	Where required by permit
E0M14	WW Storm Water MS4 - Noncompliance with section 308 Information Request	
A0M12	WW Storm Water MS4 - Numeric Effluent Violation	Where required by permit
B0M42	WW Storm Water MS4 - Violation of a milestone in an order	
D0N11	WW Storm Water Non-Construction - Discharge without a permit	No permit and no valid waiver or exemption
D0N18	WW Storm Water Non-Construction - Failure to apply for a notice of termination	Failure to submit a Notice of Termination when transferring authority or ceasing operations
B0N12	WW Storm Water Non-Construction - Failure to Conduct Inspections	
B0N17	WW Storm Water Non-Construction - Failure to develop any or adequate SWPPP/SWMP	
B0N18	WW Storm Water Non-Construction - Failure to Implement SWPPP/SWMP	
B0N41	WW Storm Water Non-Construction - Failure to Maintain Records	
C0N11	WW Storm Water Non-Construction - Failure to Monitor	
BN19A	WW Storm Water Non-Construction - Failure to properly install/implement BMPs	
BN19B	WW Storm Water Non-Construction - Failure to properly operate and maintain BMPs	
D0N12	WW Storm Water Non-Construction - Failure to submit required permit application information	This is a CWA §308 violation.
E0N16	WW Storm Water Non-Construction - Failure to submit required report (non-DMR)	
A0N22	WW Storm Water Non-Construction - Narrative effluent violation	

<b>Code</b>	<b>Description</b>	<b>Definition</b>
E0N14	WW Storm Water Non-Construction - Noncompliance with section 308 Information Request	
A0N12	WW Storm Water Non-Construction - Numeric Effluent Violation	
B0N42	WW Storm Water Non-Construction - Violation of a milestone in an order	

**Attachment 2 - Available RNC Detection codes** (taken from PCS Table 195)

Bold codes trigger SNC code “E- Effluent Violations” quarterly status for Single Event Violations. Italicized text codes trigger RNC code “N-Reportable Noncompliance” quarterly status for Single Event Violations. *Note that “DIS” means “discretionary.”*

Code	Description	Definition	Setting Type	QNCR Category
A	ENF_ADMINISTRATIVE ORDER	Measurement exceeded administrative monthly average limit set by a formal enforcement action	Automatic	I (A)
<b>B</b>	<b>DIS_MANUAL 2A4 _ PASS_THROUGH</b>	<b>Discretionary or manual entry of a violation of a pass-through of pollutants</b>	<b>Manual</b>	<b>II (A) (4)</b>
C	CHR_CHRONIC VIOLATION	Chronic violation of four or more violations of the monthly average occurring within a consecutive six month time frame.	Automatic	I (C)
<i>D</i>	<i>DIS_MANUAL OTHER</i>	<i>Discretionary or manual entry of violation of condition in enforcement orders except compliance schedules and reports</i>	<i>Manual</i>	<i>I (A)</i>
<i>E</i>	<i>DIS_MANUAL 2F _ PRMT NARRATIVE</i>	<i>Discretionary or manual entry of a permit narrative violation</i>	Manual	<i>II (F)</i>
<i>F</i>	<i>DIS_MANUAL 2G _ VIO OF CONCERN</i>	<i>Discretionary or manual entry of a permit violation of concern to the Director or Regional Administrator</i>	<i>Manual</i>	<i>II (G)</i>
<b>G</b>	<b>DIS_MANUAL 2A1 _ EFFLUENT VIOL</b>	<b>Discretionary or manual entry of Category II permit limit violation</b>	<b>Manual</b>	<b>II (A) (1)</b>
H	CHR_CHRONIC VIO, NON_MONTH AVG	Chronic violation of four or more violations of the non-monthly average occurring within a consecutive six month time frame	Automatic	II (A) (1)
<b>I</b>	<b>DIS_MANUAL 2A2 _ UNAUTH BYPASS</b>	<b>Discretionary or manual entry of violations or an unauthorized by-pass</b>	<b>Manual</b>	<b>II (A) (2)</b>
<b>J</b>	<b>DIS_MANUAL 2A3 _ UNPERM DISCH</b>	<b>Discretionary or manual entry of violations of an unpermitted discharge</b>	<b>Manual</b>	<b>II (A) (3)</b>
K	RPT_NONREC VIOL, NON_MONTH AVG	Reporting violation was 30 days overdue for the non-monthly average or the DMR was incomplete where the non-monthly average was missing	Automatic	II (A) (1)

Code	Description	Definition	Setting Type	QNCR Category
N	RPT_NONRECEIPT OF DMR/CS RPT	Reporting violation was 30 days overdue for the monthly average or the DMR was incomplete where the monthly average was missing	Automatic	I (D) for DMR nonreporting & Cat. I nonreporting for compliance schedules; or II (D) for Cat II nonreporting for compliance schedules; or II (E) for incomplete DMRs
P	ENF_ADMIN ORDER, NON_MONTH AVG	Measurement exceeded administrative non-monthly average limit set by a formal enforcement action	Automatic	II (A) (1)
Q	<i>DIS_MANUAL 2B PRETREATMENT</i>	Discretionary or manual entry of permit pretreatment	Manual	II (B)
R	TRC_TRC VIOL, NON_MONTHLY AVG	TRC limitations were exceeded for two violations of non-monthly averages within a consecutive six month time frame or chronic violations	Automatic	II (A) (1)
S	SCH_COMPLIANCE SCHEDULE VIOL	Compliance schedule violations were 90 days overdue	Automatic	I (B) for Cat. I, or II (C) for Cat. II
T	TRC_TRC LIMITATIONS EXCEEDED	TRC limitations were exceeded for two violations of monthly averages within a consecutive six month time frame or chronic violations	Automatic	I (C)
U	EFF_OTHR VIO W/TRC NON_MNTH AV	Effluent violations of the non-monthly average occurring within a consecutive six month time frame associated with TRC RNC	Automatic	II (A) (1)
V	EFF_OTHER VIOLATION WITH TRC	Effluent violations of the monthly average occurring within a consecutive six month time frame associated with TRC RNC	Automatic	I (C)
W	<i>DIS_MANUAL 2E DEFICIENT RPT</i>	<i>Discretionary or manual entry of deficient report violations</i>	<i>Manual</i>	<i>II (E)</i>

Code	Description	Definition	Setting Type	QNCR Category
X	EFF_MANUAL OTHER VIOL W/ TRC	Discretionary or manual entry of effluent violations occurring within a six month time frame associated with TRC RNC	Manual	I (C)
Y	TRC_MANUAL TRC	Discretionary or manual entry of TRC limitations that were exceeded for two violations of monthly averages within a six-month time frame or chronic violations exceeding TRC limitations	Manual	I (C)
Z	CHR_MANUAL CHRONIC	Discretionary or manual entry of four or more violations occurring within a six-month time frame	Manual	I (C)

**Attachment 3 - Available RNC Resolution codes (taken from PCS Table 390)**

Code	Description	Setting Type
A	NC - MANUAL UNRESOLVED RNC	Manual
B	RE - MANUAL BY EPA/STATE ACTION	Manual
W	NC - WAITING RNC RESOLUTION	Automatic
1	NC - UNRESOLVED RNC	Automatic
2	RE - BACK INTO COMPLIANCE	Automatic
3	RP - DUE TO FORMAL EA	Automatic
4	RP - IN COMPLIANCE LAST QTR	Automatic
5	RE - RESOLVED RP BY EA W/ CL	Automatic
6	RE - MANUAL RES BY EA W/ CL	Manual
7	RE - MANUAL RP IN COMP W/ADM LMT	Manual
8	RP - MANUAL DUE TO FORMAL EA	Manual
9	RE - MANUAL BY BACK INTO COMPL	Manual

**Attachment 4 - Available QNCR Status codes (taken from PCS Table 440)**

Those listed in bold below are the only ones that apply to Single Event Violations.

**C**      **COMPLIANT**  
D      NC\_SNC DMR NON\_RECPT (SNC)  
**E**      **NC\_SNC EFFLUENT VIOL (SNC)**  
N      **NC\_RNC VIOLTNS ONLY**  
**P**      **RESOLVED PENDING**  
**R**      **RESOLVED**  
S      NC\_SNC COMP SCHED VIO (SNC)  
T      NC\_SNC COMP SCHED RPT (SNC)  
X      NC\_SNC EF NONMNTH AV (SNC)

**Attachment 5 – Entering and Tracking Single Event Violations, Linking Them to Enforcement Actions, and Detecting and Resolving RNC in PCS** (taken from PCS Data Entry, Edit, and Update Manual and modified)

**6.2.16 Single Event Violation Data Type**

Single event violation data in PCS contains information about violations that are neither effluent limit violations nor compliance schedule violations. For example, a single event violation record in PCS might contain information concerning an unauthorized bypass, or a violation detected during an inspection.

Single event violation data is structured so that one record exists on the data base for each single event violation. Each record is uniquely identified by its key data elements, the facility NPDES Number, the Single Event Violation Code, and the Single Event Violation Date.

*Single Event Violation Code (SVCD):* The Single Event Violation Code is used to describe the type of violation that has occurred. For example, the code 07099 indicates that the permittee failed to meet a Section 308 Request.

*Single Event Violation Date (SVDT):* The Single Event Violation Date indicates the date that the violation took place.

*Quarterly Noncompliance Report (QNCR) Compliance Violation Data Elements:* No automatic Reportable Noncompliance (RNC) detection is performed by the system for single event violations (however resolution is automatically performed by the system). All RNC for single event violations are manually entered and determined, with the exception that resolved pending violations are automatically resolved by the closure of a formal enforcement action.

*QNCR Single Event Violation Detection Code (SNCS):* This data element contains a code which describes the type of RNC for the single event violation.

*QNCR Single Event Violation Detection Date (SNDS):* The date that corresponds to the QNCR Single Event Violation Detection Code.

*QNCR Single Event Violation Resolution Code (SRCS):* This data element contains a code which indicates the RNC resolution status, if appropriate, of a single event violation.

*QNCR Single Event Violation Resolution Date (SRDS):* The date that corresponds to the QNCR Single Event Violation Resolution Code.

**8.4.3 Single Event Violations Independently Determined by the Agency**

Events that are independently determined by the Agency to be violating a permit, such as an unauthorized bypass, or a violation detected during an inspection, can be manually entered into the system by using input card '-N' or the SVIO screen on PCS-ADE. This information is entered using at least the NPDES Number (NPID), the Single Event

Violation Code (SVCD), and the Single Event Violation Date (SVDT). Two user data elements (RDS1 and RDS2) are available to further describe the violation. In addition, should the Agency or authorized State consider the violation to be Reportable Noncompliance (RNC), the QNCR Single Event Violation RNC Detection Code (SNCS), detection date (SNDS), resolution code (SRCS), and resolution date (SRDS) can be manually entered. Manual entry of RNC is discussed in the next section.

### **Manual Detection/Resolution of RNC Violations**

For single event violations, reportable noncompliance must be set manually as no automatic RNC detection is performed. Automatic resolved pending and resolution is performed when the single event violations have been addressed by formal enforcement action and extended compliance schedule.

Otherwise, single event violations must be manually resolved. The manual setting of RNC codes and dates is accomplished through designated codes for manual entry. The manually entered codes are identified in "RNC Detection Codes" in PCS Table 195 (Attachment 2). All manually resolved violations require that the resolution date be entered. The system will not generate a date to accompany a user entered resolution code.

In addition to batch cards, the user may use PCS-ADE to manually enter RNC codes and dates. The SVIO screen is used to manually enter RNC codes and dates for single event violations. The following step shows how to manually set RNC for single event violations: Enter into PCS a change to the single event violation contained in PCS. The following is a minimum number of data elements that must be entered.

Table 8-25. Coding Manual Detection/Resolution of Single Event Violations

Data Element	Acronym	Value
Transaction Code	-----	'C' for change
Card Type Code (if applicable)	-----	'-N' for new batch cards
NPDES Number	NPID	NPDES Permit Number
Single Event Violation Code	SVCD	The single event violation code of the event being set to RNC.
Single Event Violation Date	SVDT	The single event violation date of the event being set to RNC.
QNCR Single Event Violation Detection Code	SNCS	<p>Enter one of the following manual codes to designate the type of RNC:</p> <p>B-Discretionary or manual entry of a violation of a pass-through of pollutants</p> <p>D-Discretionary or manual entry of violation of condition in enforcement orders except compliance schedules and reports.</p> <p>E-Discretionary or manual entry of a permit narrative violation.</p> <p>F-Discretionary or manual entry of a permit violation of concern to the Director or Regional Administrator.</p> <p>G-Discretionary or manual entry of violations of an unauthorized by-pass.</p> <p>I-Discretionary or manual entry of violation of an unpermitted discharge.</p> <p>Q-Discretionary or manual entry of permit pre-treatment violation.</p> <p>W-Discretionary or manual entry of incomplete or deficient report.</p>
QNCR Single Event Violation Detection Date	SNDS	Date of the instance of reportable noncompliance in MMDDYY format where MM=month; DD=Day; and YY=year.
QNCR Single Event Violation Resolution Code	SRCS	<p>Enter one of the following manual resolution codes:</p> <p>6-Manual resolution by close-out of a formal enforcement action.</p> <p>7-Manual resolution of resolved pending of an administrative limit.</p> <p>8-Manual resolution of resolved pending due to formal enforcement action.</p> <p>9-Manual resolution by back into compliance.</p> <p>A-Manual unresolved RNC. Resolution Date cannot be entered.</p>
QNCR Single Event Violation Resolution Code	SRDS	<p>Resolution data associated with the resolution code in MMDDYY format where MM=month; DD=day; and YY=year.</p> <p><b>Note:</b> The SRDE must be within the 6-month RNC window for the violation to appear as resolved on the QNCR.</p>



2. Edit Check Criteria - the following edits are performed for data entered on this screen.
  - a. The State Code (STTE) portion of the Permit Number (first two characters) is checked against the Region/State entering the data. The numeric portion is checked to ensure it is a valid permit number.
  - b. The Single Event Violation Code (SVCD), the RNC Detection Code (SNCS), and the RNC Resolution Code (SRCS) are checked for valid codes.
  - c. All dates are checked for valid date ranges.
  - d. For a NEW transaction, the data base is checked to ensure that the key data elements do not already exist in the data base.
  - e. For a CHANGE or DELETE transaction, the data base will be checked to ensure that the key data elements do exist in the data base.
3. Key Data Elements - Automatic change option will retrieve the information for user-entered data fields.

### **6.2.13 Enforcement Action Data Type**

Enforcement Action records in PCS are structured so that one enforcement action record exists for each enforcement action issued. The Enforcement Action record contains general information about the action such as the type of action taken, the date the action was taken, and whether the EPA or a State issued the Enforcement Action. Enforcement Action Violation Key records ("ENFORCEMENT ACTION Sub-Menu" in topic 4.3.11.3) contain information describing which violations are addressed by the enforcement action.

There are two levels of enforcement response: 1) informal enforcement; or 2) formal enforcement. The informal enforcement response includes a phone call, an inspection, a letter of violation, a notice of violation, or an administrative penalty order. The formal enforcement response is an action that "requires actions to achieve compliance, specifies a timetable, contains consequences for noncompliance that are independently enforceable without having to prove the original alleged violation and subjects the person to adverse legal consequences for noncompliance."<sup>1</sup> A formal enforcement response includes an unilateral administrative order or administrative order by consent (with or without a penalty), a civil judicial consent decree, a Court order, or a criminal action.

Enforcement Action Code (ENAC): The Enforcement Action Code is a two character numeric code used to describe the nature of the enforcement action taken. For example, the code of '21' is used for an Administrative Order. In the Enforcement Action Codes Table, each Enforcement Action Code is identified by five numbers 1 to 5 as follows:

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<sup>1</sup> See NPDES Enforcement Management System, (1986, revised in 1989), Chapter 1, p. 24.

<u>Code</u>	<u>Nature of Action</u>
1	Informal Action
2	Administrative Action
3	Judicial Action
4	Other Action
5	Permit Modification
P	Penalty

Types 2 and 3 are considered 'formal' enforcement actions. While all 5 types may be entered in PCS, only formal enforcement actions resolve violations for QNCR purposes. Please note that Type P refers to administrative penalty orders (APOs), which are regarded by PCS as informal actions because they do not resolve RNC. The Enforcement Action Code is one of the key elements on all Enforcement Action records.

*Enforcement Action Date (ENDT):* The Enforcement Action Date is the effective date of the enforcement action being entered. For informal actions, such as phone calls, recommendations, etc., it is the date the action was taken. The Enforcement Action Date is one of the key data elements on all Enforcement Action records.

*Enforcement Action Type Order Issued (EATP):* The Enforcement Action Type Order Issued code is used to indicate whether the action was issued by the EPA or by an authorized State. If the action was issued by the EPA, an 'E' is entered; if the action was issued by a State, an 'S' is entered. The Enforcement Action Type Order Issued is one of the key elements on all Enforcement Action records.

*Enforcement Action Status Code (ENST):* The Enforcement Action Status Code is a non-key data element used to indicate the status of a violation with respect to the enforcement action taken. If a minor or rare excursion has taken place, an appropriate response may be a phone call or letter to the permittee. The violation may then be considered resolved, in which case the code 'RE' may be entered. A more serious violation or series of violations may warrant some type of formal enforcement action. If a formal enforcement action is superseded by another formal enforcement action, then the code 'CS' should be encoded to show the enforcement action has been 'Closed, Superseded' by another formal enforcement action. After the enforcement action has been formally closed, the status code may be changed to 'CL' indicating closure. When the status code has been changed to 'CL' indicating closure of the enforcement action, any violations that were tied to the enforcement action through the Enforcement Action Violation Keys and were resolved pending will be resolved.

*Enforcement Action File Number (ERFN):* The Enforcement Action File Number, also called the docket number, is a non-key data element established to contain a unique number identifying a formal enforcement action. If an enforcement action establishes interim effluent limits and/or a compliance schedule, the file numbers in these locations (the Limit File Number (PLFN) and Compliance Schedule File Number (CSFN)) should be identical to the Enforcement Action record (identifiers are used in automatic processing on the QNCR). If no docket number is available then one should be

fabricated. The Enforcement Action File Number is required for all formal enforcement actions for major facilities.

*Enforcement Action Comment (ECMT, ECM0-ECM9):* The Enforcement Action Comment data element, composed of ten separate subfields, each independently retrievable, is used to load pertinent comments on the Enforcement Action record. When an enforcement action is listed on the QNCR, these comments will appear in their entirety. Generally, the comment data element should be used to explain information about the corresponding violations or the action itself. The enforcement action comment data element is required, if appropriate, for all formal enforcement actions taken against major permittees. Only one set of comments can be entered for each enforcement action.

#### **6.2.14 Enforcement Action Violation Key Data Type**

Enforcement action violation key records are used to relate an enforcement action to the violations it addresses. Because an enforcement action often addresses several types of violations, there may be many enforcement action violation key records for each enforcement action. This record contains the enforcement action key and whatever violation key data is necessary to identify the violations addressed.

Enforcement action violation key records in PCS fall into four broad categories: 1) those that relate the enforcement action to compliance schedule violations, 2) those that relate to effluent violations, 3) those that relate to DMR non-receipt violations, and 4) those that relate to single event violations. In each category, the enforcement action may be associated with either each individual violation or with a broader grouping of violations. All data elements in the Enforcement Action Violation Key data type are key data elements.

*Enforcement Action Code (EKAC):* This data element is always the same as the corresponding enforcement action data element (ENAC).

*Enforcement Action Type Order Issued (EKTP):* This data element is always the same as the corresponding enforcement action data element (EATP).  
*Enforcement Action Date (EKDT):* This is always the same as the corresponding date on the enforcement action record (ENDT).

*Enforcement Action Violation Type (EVTP):* The Enforcement Action Violation Type Code is used to indicate how the Enforcement Action is related to the violations it addresses.

##### **1. Effluent Violations:**

Code	Description
------	-------------

E1	Indicates that an enforcement action record is to be associated with all effluent violations prior to the date of the enforcement action, and after the last enforcement
----	--

action, if present. On PCS-ADE, this type of violation key record is generated by the system when the enforcement action record is entered, if the user enters 'X' in the 'ALL NUMERIC EFFLUENT' option under 'Violations that caused the enforcement action to be issued' data element.

E2 Indicates that an enforcement action record is to be associated with all effluent violations during a particular monitoring period. In addition to the enforcement action key data elements, the monitoring period end date must also be entered. Optionally, an enforcement action could be associated with effluent violations for a particular outfall and monitoring period. In this case the outfall number (3-digit or 4-digit) would be entered with the monitoring period end date.

E3 Indicates that the enforcement action record is to be associated with a particular effluent violation. All measurement/violation key data elements must be entered in addition to the enforcement action keys. If the measurement/violation record that the enforcement action key record addresses is deleted, then PCS will also delete the corresponding enforcement action key record. If any of the keys to the measurement/violation record are changed by PCS during the reissuance process, then those key elements are also changed on the enforcement action key record to maintain the relationship between enforcement action and violation. See "Permit Reissuance Processing" in topic 6.3 for more information on the reissuance process.

## 2. Non-reporting Violations

Non-reporting violations are very similar to effluent violations. The codes N1 through N9 are used to indicate the categories of DMR non-reporting violations and authorized agencies.

## 3. Compliance Schedule Violations

Code	Description
------	-------------

C1	Indicates that the enforcement action relates to all compliance schedule violations prior to the date of the enforcement action. On PCS-ADE, this type of violation key record is generated by the system when the enforcement action record is entered, if the user enters 'X' in the 'ALL COMPLIANCE SCHEDULES' option under 'Violations that caused the enforcement action to be issued' data element.
----	---

C2	Indicates that the enforcement action is related to an individual compliance schedule violation. The key data elements for the compliance schedule violation must be entered in addition to the enforcement action keys.
----	--



Y - Scans the screen for errors. If no errors are found, data entered is saved and the screen is cleared in preparation for data entry of another Enforcement action. This value is automatically displayed and is the default if a value is not entered.

K - Scans the screen for errors. If no errors are found, the data is saved. All data elements except the key data and transaction codes are cleared so that another enforcement action may be entered for the same permit. Accept option 'K' retains key data fields (rather than defaulting to accept option 'Y') only if the user does not enter any enforcement action keys. If 'K' is entered and the user enters specific violation keys, when returning from the EAKS screen all the key information will remain.

N - Ignores any data entered on the screen. All data elements are cleared so that the same screen can be reentered.

M - Returns the user to the main menu. All data entered on the screen is ignored.

2. Edit Check Criteria - Data entered on the Enforcement Action screen are edit checked as follows:

a. The State Code (STTE) portion of the Permit Number (first two characters) is checked against the Region/State entering the data. The numeric portion is checked to ensure it is a valid permit number.

b. The Enforcement Action Code (ENAC), Type Order Issued (EATP), and Status Code (ENST), are checked for validity in the PCS tables.

c. Dates are checked for valid date ranges.

d. For a NEW enforcement action, the data base is checked to ensure that the new enforcement action key data elements do not already exist in the data base.

e. To CHANGE or DELETE an enforcement action, the data base will be checked to ensure that the enforcement action key data elements do exist in the data base.

f. Confirmation Screen appears on MASS DELETE transactions for enforcement actions and related keys for compliance schedules, effluents, and single event violations.

3. Key Data Elements - Automatic change option will retrieve the information for user-entered data fields.

4. Violations that caused the Enforcement Action to be Issued:

a. If the user entered 'X' in any of the first six options addressing all violations, PCS-ADE automatically generates the appropriate enforcement action key records. If the user enters '\*' in any of these options, PCS-ADE automatically deletes the appropriate enforcement action key records (if transaction code entered was 'C')



Y - Choosing the cycle option allows the user to cycle through violations in PCS and to link the enforcement action to violations while cycling.

N - Disables the cycle option for the Enforcement Action Key Screen. When the user enters <CR>, a data screen will appear as shown in Figure 3-56 in topic 3.2.33.2. The user must enter key information for the violations to be addressed. The cycle option may be used only if the Violation Type (EVTP) links the enforcement action to specific violations, for example, E3, C2, S2, N8, etc. The EAKS key screen will respond by EXPANDING the screen as shown in Figure 3-53.

Figure 3-53. Expanded Enforcement Action Key Screen (EAKS/SV) --Expanded to limit Single Event violations displayed by the cycle option.

```
| 09:14:56                PCS-ADE                PCDEEAKS |
| 11/14/90                SCREEN ID: EAKS        |
|
|          ENFORCEMENT ACTION
|          KEY SCREEN
|
| PERMIT # _____
| TRANS CODE  _
|
| ENFORCEMENT ACTION CODE ____
| TYPE ORDER ISSUED  _
| ENFORCEMENT ACTION DATE _____
| VIOLATION TYPE  ____
| DO YOU WISH TO CYCLE (Y/N)?  _
|-----|
|
| VIOLATION CODE _____
| VIOLATION DATE  _____
|
|
| ACCEPT (Y/N/M)? Y                VERSION 2.3   12/19/89
```

1. Extended Key Screen Accept Options - After entering the Enforcement Action Key Screen data, the user responds to the prompt 'Accept (Y/N/M)?' by entering one of the following choices followed by a <CR>.

Y - Scans the screen for errors. If no errors are found, one of the three data screens is displayed. PCS-ADE chooses the data screen to be displayed based on the Violation Type (EVTP) the user has entered. For example, if the user has entered 'E3' in the Violation Type, the effluent screen is displayed, or if he has entered 'C2', the compliance schedule screen is displayed.

N - Ignores all data entered and clears all data elements on the screen. If the user accessed the EAKS screen from the ENAC screen, the user is returned to ENAC.

M - Ignores all data entered and returns user to the main menu. These expanded versions of EAKS Key screen will only be seen if the cycle option is chosen. After the user has provided any applicable values, an EAKS data screen will appear, with the key data for the first violation in PCS as shown in Figure 3-56.

Figure 3-56. EAKS Data Screen for Single Event Violations

```

08:44:13      ENFORCEMENT ACTION SINGLE EVENT VIOLATION KEY SCREEN      PCDEEASF
11/14/90                                           SCREEN ID: EAKS
PERMIT # _____ TRANS CODE _
ENFORCEMENT ACTION CODE ___      NO CURRENT ACTM WARRANTE
ISSUED BY _      ENFORCEMENT ACTION DATE _____
VIOLATION TYPE ___      SPECIFIC SINGLE EVENT VIOL
-----
SINGLE EVENT VIOLATION CODE _____
SINGLE EVENT VIOLATION DATE _____

ACCEPT (Y/N/C/S/M)? Y      VERSION 2.2      03/12/90

```

2. Data Screen Edit Check Criteria - data entered on one of the Enforcement Action Key Data Screens are edit checked as follows:

- a. All encoded values are checked against the PCS tables for validity.
- b. All dates entered are checked for valid date ranges.

#### 8.4.6.3 Detection/Resolution of RNC by EA - For Single Event Violations

Single Event Violations are detected manually, but are automatically resolved by the system if the violations are addressed by a formal enforcement action. The PCS Reportable Noncompliance (RNC) tracking system will automatically set the single event violation resolution code and date to resolved/resolved pending when there is an associated enforcement action with an extended compliance schedule for either all or specific single event violations. For this to take place the below must be true:

1. The RNC Detection Date must be less than or equal to the Enforcement Action Date.

2. A Formal Enforcement Action must be present.
3. There must be an extended compliance schedule for either all or a specific single event violation (enforcement type = 'S1' or 'S2').
4. Matching Docket numbers must be entered in the Enforcement Action File Number (ERFN) field and in the Compliance Schedule File number (CSFN) field.

Resolved pending resolution of RNC for single event violations occurs when an extended compliance schedule is entered into the system. The Compliance Schedule Number (CSCH) must be an Extended Compliance Schedule for resolution to take place (See Table 8-2 in topic 8.4.6.1 for specific codes). In addition to the extended compliance schedule, a formal enforcement action that contains the same Enforcement Action File Number (ERFN) as the extended Compliance Schedule File Number (CSFN) and relating to the type of individual violations must be in PCS. The enforcement action and extended compliance schedule can be entered in the same update.

Table 8-2. Extended Compliance Schedule Codes (CSCH)

<b>CSCH</b>	<b>Extended Compliance Schedule Description</b>
CC	Schedule established by CCP
CO	Consent Order
DA	309 (A) (5) (A) - Interim
DB	309 (A) (5) (A) - Final
DC	309 (A) (5) (A) - Municipals
DD	309 (A) (5) (B)
DE	309 (A) (6)
DY	Admin. Orders for Municipals
DZ	Admin. Orders for Industrials
FF	Fed. Facility Compliance Agreement
GA	Fed. Judicial Decrees
HA	State Judicial Decrees
HC	State Non-Judicial Decrees (Ind.& Mun.)
VA	State Admin. Decrees
MC	Enf. Schedule for Municipals Compliance Strategy
PT	Pretreatment, Enforcement Action

If the QNCR Single Event Violation Resolution Code (SRCS) is '3' (resolved pending), the QNCR Single Event Resolution Date (SRDS) contains the Enforcement Action Date (ENDT).

To resolve the single event violations, a formal enforcement action must be entered into PCS as follows: Enter a change to the formal enforcement action previously entered into

PCS with a status code indicating closure of the action. The following is the minimum amount of data elements that should be entered.

Table 8-20. Coding Closure of an action for Single Event Violations

Data Element	Acronym	Value
Transaction Type	-----	'C' for change
Card Type Code (if applicable)	-----	'-R' for new batch cards.
NPDES Number	NPID	NPDES Permit
Enforcement Action Code	ENAC	The enforcement action code of the formal action being closed. (Must have a '2' or '3' in the table).
Enforcement Action Date	ENDT	The date of the enforcement action being closed.
Enforcement Action Type Order Issued	EATP	The type order issued of the enforcement action being closed.
Enforcement Action Status Code	ENST	'CL' for closed
Enforcement Action Status Date	ESDT	Closure date in MMDDYY format where MM=month, DD=day, and YY=year. Date should be after QNCR period start date to show on current QNCR.

When an enforcement action is closed out and the requirements of the formal enforcement action are satisfied, then all resolved pending violations are resolved. When a formal enforcement action is entered with an Enforcement Action Status Code (ENST) of 'CL' and a valid Enforcement Action Status Date (ESDT) covering the violation type or individual violations, the corresponding RNC Single Event violations are resolved with a QNCR Single Event Violation Resolution Code (SRCS) of '5' and the QNCR Single Event Violation Resolution Date (SRDS) equal to the Enforcement Action Status Date (ESDT). These violations will then be shown as resolved on the upcoming QNCR and be dropped from subsequent QNCRs.

If an enforcement action has not been added, an error message is generated on the update report to indicate that there is a missing enforcement action for the extended compliance schedule and that resolved pending resolution cannot take place.

If the violation(s) are not resolved via a formal enforcement action (i.e. through an informal action, voluntarily, due to site closure, or for any other reason), the violations will have to be manually resolved as described earlier through the use of manual codes provided in PCS Table 390 (provided in Attachment 3).

## ATTACHMENT 1

### FREQUENTLY ASKED QUESTIONS ABOUT SINGLE EVENT VIOLATIONS

The Single Event Violation Data Entry Guide is a comprehensive document that examines most facets of reporting. This FAQ provides a management overview of the document in a question/answer format.

#### **What is a Single-Event Violation?**

A violation of regulatory/permit requirements under the CWA-NPDES program that is determined by means other than automated computer calculations of: a) a permit limit to a measurement; or b) a compliance schedule event due date to actual date. For example, a violation found during an inspection would be a single-event violation.

#### **Does Single-Event Violation Mean a One-Day Event?**

No. A Single Event Violation can occur on one day only, or across multiple days.

#### **What is the Importance of Tracking Single Event Violations?**

Single Event Violation tracking in the Permit Compliance System and the planned ICIS-NPDES databases provide the only national data fields that describe the findings of inspection or other monitoring activities. Single Event Violation tracking allows the permit authority to electronically record the finding, and allows the violation to be tracked through resolution (e.g., returned to compliance, enforcement action taken, etc.).

#### **Is Single Event Tracking Required by States?**

The current required data entry list (known as WENDB) includes Single Event Violations discovered at major facilities. To properly track resolution of violations discovered through means such as inspections, complaints, and facility self-audits, it is important that this information reside in the national system.

#### **How Does the Single Event Violation Guide Improve Data Tracking?**

In addition to standardizing the list of possible Single Event Violations, EPA has included text definitions (where appropriate) to help the permitting authority choose the right database code. Prior to issuance of this Guide, there were no national definitions and reporting guidance covering Single Event Violations. Code standardization and definitions were the primary barriers cited by PCS users to accurate reporting.

### **Does the Violation Have to Be Adjudicated before It is Entered into the Database?**

No. In fact, EPA and states routinely enter violations in other program databases that are not final legal determinations. EPA is very careful in its public web sites (see [www.epa.gov/echo](http://www.epa.gov/echo)) to point out that violation status is a preliminary agency determination and not a legal finding of fact.

### **Is an Enforcement Action Required to Close Out a Single Event Violation?**

No. EPA expects that many Single Event Violations will be resolved (returned to compliance by the permittee) without the need for formal enforcement.

### **What are the Conventions for Entering Single Event Violations?**

There are three essential parts to the Single-Event Violation data, along with other related data. The first essential part is the start date of the violation, the second piece is the type of violation that occurred, and the third piece is the date the violation ended (sometimes items 1 and 3 are the same date). All violation types that should be entered into the system are included in PCS (and ICIS-NPDES). This new list is a “cleaned-up” version of the pre-existing values that were often poorly defined and/or redundant. Where possible, EPA has defined each violation in the Data Entry Guide. Supplemental information that is also critical for certain Single Event Violations are: the inspection or activity that led to discovery of the violation, and the resulting action taken by the permitting authority (if any).

### **Which Violations Should Be Reported?**

If a violation is discovered that is listed on in the Data Entry Guide (as it reflects the database table values), it should be entered into the system regardless of whether enforcement response is planned. If the permitting authority finds violations that are not listed in the database table, there is an “other” violation category that can be optionally selected.

### **What Level of “Proof” is Necessary to Turn Off a Single Event Violation?**

Because a wide array of violations are possible, there is no one threshold for what proof is needed. The permitting authority should make a judgment as to when it is satisfied the problem is fixed (EPA does not believe that a follow-up inspection is necessarily needed to close out a Single Event Violation).

### **How can Single Event Violations Be Used by the Permitting Authority?**

Each permitting authority can use the data to determine where inspections most frequently turn up problems (e.g., analysis of sectors, watersheds, permit types, etc.). This in turn can lead to better use of resources. Additionally, the data can help the permitting authority spot trends such as frequent or repeat patterns of violation. While one small violation may not trigger enforcement response, repeated violations may. Single event violations allow you to analyze this information without looking through paper files.

### **How Does EPA Plan to Use Single Event Violations?**

EPA will use Single Event Violation data to better understand noncompliance rates within specific areas, permit types, or sectors. As is currently the practice in the CAA and RCRA programs, EPA assesses the percent of inspections that identify noncompliance as a measure of the noncompliance rate. Single Event Violations are also currently included in EPA's public access site (ECHO) as a means to provide transparency regarding government findings.

### **Do Single Event Violations Impact the Official QNCR?**

They can. If a Single Event Violation is entered at a major facility with an "RNC detection code," it can cause the facility to appear on the Official QNCR. If the facility is a non-major, a Single Event Violation cannot place the facility on the Official QNCR, but it can cause the facility to appear in SNC or RNC (again if the proper RNC detection codes are chosen). This is described in more detail in the full Data Entry Guide.

### **Are Single-Event Violations Publicly Accessible?**

Yes. EPA already makes these data available within ECHO, or via FOIA request. The Data Entry Guide will assist EPA and States in making the information more meaningful and complete.

### **Can Single-Event Violations be Analyzed by Wet Weather Priority Area?**

Yes. The new list of code tables breaks violations down according to wet weather area. Violation data used in conjunction with permit type information will allow users to produce violator lists broken down by CAFO, CSO, Construction, and SSO universes.