



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

**OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE**

September 25, 2008

MEMORANDUM

SUBJECT: PCS Technical Update Regarding Data Fields Associated with Tracking Single Event Violations

FROM: Lucy P. Reed, Chief /s/
Data Systems and Information Management Branch

TO: Regional Water Branch Chiefs
Regional Water Enforcement Branch Chiefs
PCS Region and State Coordinators and Contacts

The purpose of this memorandum is to communicate an improved approach to tracking Single Event Violations (SEVs) in the Permit Compliance System (PCS). The changes outlined below will better align the PCS data with the Integrated Compliance Information System – National Pollutant Discharge Elimination System (ICIS-NPDES) making migration of SEV data from PCS to ICIS-NPDES easier for states moving to ICIS-NPDES in the future. In addition, the changes will support more efficient tracking of single event violations in PCS. These changes will ensure that: (1) EPA and state violations can be attributed to the appropriate “lead” agency; (2) end dates for violations can be tracked in PCS; and (3) the source of the SEV is known (e.g., inspection).

As you are aware, entry of SEVs into PCS is required for major facilities and encouraged for non-major facilities. PCS does not currently have data elements for tracking the SEV violation end date (as ICIS-NPDES does), the agency (EPA, State or Tribe) responsible for discovering the SEV violation, and an element indicating whether the violation was found through an inspection or a self-report. When a SEV is reported in PCS, it is shown as a continuing violation even though it may not be the case that the violation is still in effect. Because of this, the SEV data in PCS may not provide an accurate representation of the compliance picture for the NPDES regulated entities.

It is important to note that, PCS SEV data, as well as the ICIS-NPDES SEV data are searchable in both the Online Targeting Information System (OTIS), and the Enforcement and Compliance History Online (ECHO) public access website, and it is, therefore, critical that we ensure the accuracy of the data from PCS reported via these tools. For example, if a Region or State has entered an SEV into PCS with a Reportable Non-Compliance or Significant Non-compliance (RNC/SNC) detection code, OTIS and

ECHO treat the RNC/SNC resolution date as the SEV end date. We know that this assumption has not always been correct. For SEVs that do not rise to the level of RNC/SNC, there is no current way for a PCS user to turn off the violations (to indicate that the violation has ended).

The guidance below addresses these issues and provides States and Regions the ability to enter additional data into PCS and ensure better quality, precise and inclusive data. Your NPDES violation data entry procedures should be modified to include these new data values as referenced in the below guidance. Within the next few weeks, we will be updating the PCS Single-Event Data Entry Guide to reflect the guidance provided below. The updated PCS Single-Event Data Entry Guide will be accessible via web link <http://www.epa-otis.gov/otis/docs/PCSSingleeventviolation-guide.pdf>.

Guidance for Data Entry of SEVs in PCS

To address the issues discussed above, data entry of SEVs in PCS will include utilization of two national User Defined Fields (UDFs) that have been very lightly used in the past. The PCS user defined fields are: **RDS1**, a three character field; and, **RDS2**, a six character field.

The first UDF, **RDS1**, will be used to identify the lead agency discovering an SEV and the method through which the violation was found. The first character in RDS1 will be utilized to identify the lead agency (State, Region, or Tribe). The second character in RDS1 will be used to identify whether this violation was found through an inspection or a report. The third character of RDS1 may be reserved for state use only.

The second UDF, **RDS2**, will be used to identify the SEV end date. All six characters of this field will be used to identify the SEV end date. Appendix A offers a technical description of the entry of data into both the RDS1 and RDS2 fields.

Utilizing the user defined fields for entry of these data will change the current use of these data fields and the UDF fields in general for: future PCS to ICIS-NPDES migrations; monthly Integrated Data for Enforcement Analysis (IDEA) extracts; and, OTIS/ECHO refresh processes. The details for these changes can be found in Appendix B.

Current Data in PCS

There are currently thousands of unresolved SEVs in PCS. Some of these SEVs have been unresolved since the 1980s. To ensure higher data quality, all SEVs entered beginning on October 1, 2008 will require input of an SEV end date. SEVs entered into PCS prior to October 1, 2008 will not require input of an end date.

The existing data in PCS will not be affected by the system changes. However, states can update existing records if they want to identify the lead agency or the end date. The addition of a “lead agency” field in ICIS-NPDES is scheduled to occur in December, 2008. This will ensure that the two systems, PCS and ICIS-NPDES, are using the same data.

If you need any additional information on the content of this memorandum, please contact Michael Barrette at 202-564-7019 or at email address barrette.michael@epa.gov with questions regarding violation reporting and measures, and Jeffrey F. Clark at 202-564-2496 or at email address clark.jeffreyf@epa.gov if you have any PCS data entry questions.

Attachments

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Appendix A

Data Entry for Discovering Agency - RDS1 and SEV End Date - RDS2

Data Entry for RDS1

The RDS1 field will identify the agency that discovers the Single Event Violation. The three characters “E”, “S”, and “T” will be used in the RDS1 field to indicate the origin, lead agency, of the Single Event Violation. If the agency that discovers the SEV is the EPA, an “E” should be entered as the 1st character in RDS1. If the agency that discovers the SEV is the State, an “S” should be entered as the 1st character in RDS1. Finally, if the agency that discovers the SEV is Tribal, a “T” should be entered as the 1st character in RDS1.

[Note: If the first character in RDS1 is not entered as an S, E, or T, the IDEA refresh and ICIS-NPDES migration process will default the origin field value to “S” for State.]

The 2nd character in RDS1 will identify how the violation was discovered. If the violation was discovered through an **inspection**, an “I” should be entered as the 2nd character in RDS1. If the violation was discovered through a **report**, an “R” should be entered as the 2nd character in RDS1.

Data Entry for RDS2

The RDS2 field will be used to identify the end date of the SEV. The end date will be entered into the RDS2 field in the form of “MMDDYY”, such as June 1st, 2008 would be “060108”.

[Notes: Since the SV Record does not have a comment field in PCS, the state or region can use any portion of the ten 30-character comment fields of the EA record when they link the EA to the SV using the EA Key (EK) record.]

Appendix B

Changes to the use of current data fields and the UDF fields during the migration, IDEA extract, and OTIS/ECHO refresh process.

The PCS SV date (SVDT) will be copied to both the ICIS-NPDES SEV start date and the ICIS-NPDES SEV Date (if that field remains in ICIS-NPDES). The IDEA extract will continue to consider the date within the SV Key to be the SV start date. The migration and IDEA processing will use the first character of the RDS1 to populate the state or region discovering the SEV within IDEA and ICIS. If the first character in RDS1 is not entered as an S, E or T, the IDEA refresh and ICIS-NPDES migration process will default the origin field value to “S” for State. The migration and IDEA processing will use the second character of the RDS1 to populate how the violation was found (through an inspection or a report). If the second character of the RDS1 is not I or R, the ICIS migration and IDEA refresh will leave that value blank. The RDS2 will be the SV end date in IDEA and ICIS, if a state has a value other than a date in the RDS2, the RDS2 will be ignored by IDEA and ICIS-NPDES migration.