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

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OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

Subject: Improving Data in the Permit Compliance System (PCS)

From: Michael B. Cook, Director
Office of Wastewater Management

Elaine G. Stanley, Director
Office of Compliance

To: Regional Water Division Directors
Regional Enforcement Directors

As you are aware, the issue of data quality for the Permit Compliance System (PCS) has been and will continue to be very high priority for our respective offices and for the Regions and States. PCS directly supports a number of Agency priorities, and maintaining a high level of data quality in the system is imperative if we are to meet many of our commitments under the Government Performance and Results Act (GPRA), address important issues like permit backlogs, and provide high quality data from PCS to the public.

This need for complete and accurate data is heightened by three important considerations. First, the Agency will publish its first public report on our progress in FY'99 under GPRA early next year. One of the primary GPRA goals for water programs addresses reductions in loadings from point sources. Meeting this goal is heavily dependent on having reliable and comprehensive baseline data in PCS by the end of the fiscal year.

Second, permit backlogs have been identified as a material weakness under the Federal Managers' Financial Integrity Act (FMFIA). Accordingly, we are now directing more attention to reducing excessive permit backlog rates in many States. The Office of Water has recently developed an Annual Performance Goal (APG) addressing permit backlog which requires 80% of major point sources to be covered by a current permit by 1999 (72% is the current baseline). Much of the information currently in PCS does not allow us to gain an accurate reading of these backlogs or differentiate facilities covered by an expired individual permit from those covered under a current general permit.

Third, more complete information about the facility's location, especially for minor facilities, is necessary to enable better integration across data systems (under the Facility

Identification Initiative), to provide a more accurate picture of water quality conditions around the country under programs like the Index of Watershed Indicators (IWI), and to improve the information provided to the public on the Internet regarding where regulated sources are located.

These issues were recently discussed at the January 1999 Regional Water Division Directors meeting in San Francisco. At that meeting, it was agreed that our two offices would identify a small number of priorities for improving PCS data quality for the remainder of the fiscal year. Accordingly, we are asking for your support in three areas:

1. Significantly increasing the amount of information needed to support loadings analysis, especially flow information;

2. Ensuring that PCS information needed to clearly determine permit backlogs is accurate, including the proper identification of facilities covered by General Permits versus individual permits; and

3. Obtaining locational names and addresses for major and minor permittees.

For each of these areas, we have developed goals that we hope to attain by the end of the fiscal year. Attachment 1 provides more detailed descriptions and a set of actions we would like each Region to undertake with its States to accomplish the goals. The goals are:

- Goal 1 - Improve Design Flow Data For Loadings Analysis,
- Goal 2 - Improve Data Quality in Order to Reduce Permit Backlog Rates, and
- Goal 3 - Improve Facility Location Address Data.

Attachment 2 addresses actions designed to distinguish in PCS facilities which are covered under an expired individual permit from facilities which are covered under a current general permit. Attachment 3 provides the current data entry statistics for each Region and State for the data elements involved in this effort. Those statistics should assist in identifying where the most critical data gaps are to be found.

Although we are currently requesting only address data, it is also important that we have quality latitude and longitude data in the system. Latitude and longitude data is a critical component in meeting the Clean Water Action Plan (CWAP) goals for identifying and targeting areas with shellfish beds or beach contamination. We are <u>not</u> requesting that latitude and longitude data quality be a part of this improvement effort, but we do believe that the quality of the latitude and longitude data in PCS will soon become an issue. Data entry statistics for latitude and longitude data are provided for your information in Attachment 4. Also attached is the Guidance and Standards for Calculating Point Source Pollutant Loads Using the Permit Compliance System (PCS) for your information. This document was developed to assure that

information needed to calculate effluent loadings is entered into PCS.

Please designate a sole point of contact for this project by March 10, 1999, so that we may contact you regarding issues that arise during the course of this project. We will also be holding periodic conference calls to discuss progress and will include this effort as a discussion item for our other Regional reviews throughout the remainder of the year.

Thank you for your support of this important undertaking. If you have any questions, please contact either of us, or the staff leads on this project Steve Rubin in the Office of Compliance at (202) 564-7052 or Kelley Volak in the Office of Wastewater Management at (202) 260-0307.

Attachments

cc: Eric Schaeffer
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Attachment 1

Detailed Description of Goals

Goal 1 - Improve Design Flow Data For Loadings Analysis

Flow information (PCS design flow) is required for estimating the loading for a facility where actual flow is not available in PCS. The load is determined using a typical pollutant concentration (TPC) analysis approach. TPC analysis entails the use of the facility flow and the typical effluent concentration values for all pollutants typically discharged from facilities in that industry to estimate the loadings.

a. By the end of FY'99, improve the percentage of major facilities with design flow data from 72% to 100% for active major sources.

b. By the end of FY'99, improve the percentage of minor facilities with design flow data from 38% to at least 70% of minor facilities in every State.

Goal 2 - Improve Data Quality to Reduce Permit Backlogs

a. By the end of FY'99, ensure that permit expiration dates are entered into PCS for all facilities (currently 19% of the PCS active universe).

b. Ensure that PCS facilities contains accurate, up-to-date permit renewal and expiration dates. Many Regions may have already started correcting this problem through a targeting effort currently underway in OECA (OECA Targeting Bulletin 98-1).

c. By the end of FY'99, ensure that those permits that are covered under general versus individual permits are clearly identified so that we can get more accurate information on the backlog (See Attachment 2).

Goal 3 - Improve Facility Location Address Data

By the end of FY'99, ensure 100% entry for major facilities and 50% entry for minor facilities in every state for PCS location address data elements:

a. facility name (PCS data element RNAM) (current entry rate is 59%),

b. street (PCS data element RSTT) (current entry rate is 56%),

c. city (PCS data element RCTY) (current entry rate is 58%), and

d. zip code fields (PCS data element RZIP) (current entry rate is 50%).

Attachment 2

Accurate Representation of General Permits in PCS and PCS Clean Up

The following actions are intended to allow a more accurate backlog count by creating distinctions between facilities covered under general permits and individual permits in PCS and removing inactive facilities.

OWM has launched an effort to reduce State and EPA permit backlogs for high-risk facilities to10% or below by 2004. This effort includes the "clean up" of data in PCS to provide a more accurate measure of expired permits. Permits for inactive facilities or for facilities which are now covered under general permits often remain in the system as "expired", incorrectly increasing the backlog numbers. To correct this problem, OECA and OWM recommend a series of steps that will allow us to differentiate facilities covered under a general permit from facilities covered by an expired permit and allow a more accurate picture of the number of expired permits in PCS. These actions would contribute to OWM's overall effort to reduce permit backlog and generate better permit backlog data.

ACTIONS

1. Headquarters will create a "G" code for the IACC (Inactive Code) field. Headquarters will notify Regions and States that the "G" code has been created and is available. This action should be complete by May 1999. The "G" code will indicate that a facility is covered by a general permit.

2. Regions and States should launch a concerted effort to "clean up" PCS by inactivating facilities which are no longer operating (e.g., out of business), but which have been contributing to the backlog count by appearing as expired permits in the system.

3. After May 1999, Regions and States will enter the "G" code into the IACC field and the general permit issuance date in the IADT (Inactive Date) field.

Attachement 3

PCS Data Entry Statistics by State for Active Permitted Dischargers

		Number of Active Dischargers		Design Flow				Expiration Date		Permit Backlog (of those with an Expiration Date)			
Region	State	Minors	Majors	# Minors	% Minors	# Majors	% Majors	# Minors	# Majors	# Minors	% Minors	# Majors	% Majors
01	CT	219	109	2	0.9%	62	56.9%	167	109	129	77.2%	44	40.4%
	MA	866	149	69	8.0%	100	67.1%	317	149	222	70.0%	88	59.1%
	ME	290	97	128	44.1%	75	77.3%	214	97	172	80.4%	39	40.2%
	NH	248	69	37	14.9%	45	65.2%	112	69	92	82.1%	39	56.5%
	RI	120	27	0	0.0%	0	0.0%	119	27	84	70.6%	16	59.3%
	VT	114	34	1	0.9%	1	2.9%	113	34	43	38.1%	7	20.6%
	Total	1,857	485	237	12.7%	283	58.4%	1,052	485	752	71.5%	233	48.0%
02	NJ	2,767	171	4	0.1%	7	4.1%	2,758	171	351	12.7%	58	33.9%
	NY	1,731	363	963	55.6%	362	99.7%	1,721	363	333	19.3%	17	4.7%
	PR	180	101	159	88.3%	96	95.0%	148	99	47	31.8%	38	38.4%
	VI	77	6	47	61.0%	6	100.0%	67	6	32	47.8%	3	50.0%
	Total	4,755	641	1,173	24.6%	471	73.5%	4,697	639	766	16.3%	116	18.2%
03	DC	11	4	1	9.1%	0	0.0%	9	4	2	22.2%	2	50.0%
	DE	47	24	8	17.0%	8	33.3%	44	24	6	13.6%	6	25.0%
	MD	938	89	5	0.5%	39	43.8%	889	89	498	56.0%	22	24.7%
	PA	5,338	389	2,649	49.6%	274	70.4%	4,848	389	1,437	29.6%	47	12.1%
	VA	2,788	145	926	33.2%	111	76.6%	2,689	144	1,728	64.3%	4	2.8%
	WV	3,800	95	355	9.3%	39	41.1%	3,103	95	2,639	85.0%	8	8.4%
	Total	12,922	746	3,944	30.5%	471	63.1%	11,582	745	6,310	54.5%	89	11.9%
04	AL	1,489	212	627	42.1%	185	87.3%	1,484	212	206	13.9%	32	15.1%
	FL	395	242	96	24.3%	147	60.7%	361	241	46	12.7%	39	16.2%
	GA	827	176	459	55.5%	127	72.2%	827	176	10	1.2%	2	1.1%
	KY	2,023	127	1,385	68.5%	116	91.3%	2,001	127	33	1.6%	4	3.1%
	MS	1,770	87	1,473	83.2%	86	98.9%	1,673	87	213	12.7%	12	13.8%
	NC	1,420	221	1,407	99.1%	220	99.5%	1,413	221	205	14.5%	38	17.2%
	SC	586	191	76	13.0%	76	39.8%	576	191	39	6.8%	37	19.4%
	TN	1,392	151	249	17.9%	117	77.5%	1,360	151	75	5.5%	34	22.5%
	Total	9,902	1,407	5,772	58.3%	1,074	76.3%	9,695	1,406	827	8.5%	198	14.1%
05	IL	1,744	269	1,292	74.1%	267	99.3%	1,709	269	373	21.8%	55	20.4%
	IN	1,218	177	1,046	85.9%	134	75.7%	1,213	177	357	29.4%	102	57.6%
	MI	866	183	829	95.7%	178	97.3%	866	183	547	63.2%	83	45.4%
	MN	1,059	79	866	81.8%	79	100.0%	1,000	79	439	43.9%	28	35.4%
	OH	3,807	281	4	0.1%	156	55.5%	3,269	281	1,867	57.1%	86	30.6%
	WI	794	133	419	52.8%	83	62.4%	786	132	112	14.2%	32	24.2%
	Total	9,488	1,122	4,456	47.0%	897	79.9%	8,843	1,121	3,695	41.8%	386	34.4%

Source: Integrated Data for Enforcement Analysis (IDEA), 1/11/99 Data Extract from PCS

Attachement 3

PCS Data Entry Statistics by State for Active Permitted Dischargers

		Number of Active Dischargers		Design Flow				Expiration Date		Permit Backlog (of those with an Expiration Date)			
Region	State	Minors	Majors	# Minors	% Minors	# Majors	% Majors	# Minors	# Majors	# Minors	% Minors	# Majors	% Majors
06	AR	729	109	673	92.3%	108	99.1%	698	109	39	5.6%	22	20.2%
	LA	6,087	245	335	5.5%	100	40.8%	1,281	243	796	62.1%	119	49.0%
	NM	268	34	28	10.4%	27	79.4%	142	34	128	90.1%	19	55.9%
	OK	679	90	263	38.7%	60	66.7%	544	90	184	33.8%	33	36.7%
	TX	5,253	565	886	16.9%	363	64.2%	2,514	564	2,038	81.1%	233	41.3%
	Total	13,016	1,043	2,185	16.8%	658	63.1%	5,179	1,040	3,185	61.5%	426	41.0%
07	IA	1,719	123	960	55.8%	112	91.1%	1,625	123	385	23.7%	35	28.5%
	KS	1,157	57	745	64.4%	52	91.2%	1,126	57	443	39.3%	34	59.6%
	MO	2,886	147	2,710	93.9%	146	99.3%	2,519	147	390	15.5%	23	15.6%
	NE	1,211	60	491	40.5%	60	100.0%	1,033	60	815	78.9%	43	71.7%
	Total	6,973	387	4,906	70.4%	370	95.6%	6,303	387	2,033	32.3%	135	34.9%
08	CO	439	106	138	31.4%	68	64.2%	367	106	130	35.4%	50	47.2%
	MT	147	44	67	45.6%	26	59.1%	147	44	25	17.0%	10	22.7%
	ND	195	26	38	19.5%	16	61.5%	183	26	2	1.1%	0	0.0%
	SD	378	31	251	66.4%	22	71.0%	367	31	30	8.2%	8	25.8%
	UT	95	34	28	29.5%	26	76.5%	94	34	9	9.6%	6	17.6%
	WY	919	28	45	4.9%	16	57.1%	915	28	105	11.5%	4	14.3%
	Total	2,173	269	567	26.1%	174	64.7%	2,073	269	301	14.5%	78	29.0%
09	AS	3	4	1	33.3%	4	100.0%	3	4	0	0.0%	4	100.0%
	AZ	154	36	104	67.5%	31	86.1%	121	36	40	33.1%	19	52.8%
	CA	772	239	765	99.1%	234	97.9%	734	237	157	21.4%	70	29.5%
	GU	12	8	8	66.7%	8	100.0%	10	8	7	70.0%	4	50.0%
	HI	54	27	15	27.8%	22	81.5%	47	27	21	44.7%	10	37.0%
	JA	1	0	0	0.0%	0	ERR	1	0	0	0.0%	0	ERR
	MW	1	0	1	100.0%	0	ERR	1	0	1	100.0%	0	ERR
	NI	5	2	3	60.0%	2	100.0%	4	2	4	100.0%	2	100.0%
	NV	76	9	37	48.7%	8	88.9%	75	9	13	17.3%	3	33.3%
	Total	1,078	325	934	86.6%	309	95.1%	996	323	243	24.4%	112	34.7%
10	AK	295	48	7	2.4%	21	43.8%	163	43	150	92.0%	19	44.2%
	ID	274	67	11	4.0%	28	41.8%	176	66	175	99.4%	53	80.3%
	OR	1,247	71	6	0.5%	49	69.0%	1,183	71	786	66.4%	51	71.8%
	WA	680	92	196	28.8%	51	55.4%	582	92	410	70.4%	45	48.9%
	Total	2,496	278	220	8.8%	149	53.6%	2,104	272	1,521	72.3%	168	61.8%
Total		64,680	6,703	24,394	37.7%	4,856	72.4%	52,524	6,687	19,633	37.4%	1,941	29.0%

Source: Integrated Data for Enforcement Analysis (IDEA), 1/11/99 Data Extract from PCS

Attachement 4

PCS Data Entry Statistics by State for Active Permitted Dischargers

		Facility Name		City Code		Facility Location Information								Latitude and Longitude	
						Name		Street		City		ZIP			
Region	State	#	%	#	%	#	%	#	%	#	%	#	%	#	%
01	CT	325	99.1%	269	82.0%	96	29.3%	95	29.0%	95	29.0%	95	29.0%	124	37.8%
	MA	1,011	99.6%	952	93.8%	667	65.7%	661	65.1%	670	66.0%	642	63.3%	519	51.1%
	ME	387	100.0%	372	96.1%	298	77.0%	283	73.1%	299	77.3%	294	76.0%	125	32.3%
	NH	308	97.2%	263	83.0%	181	57.1%	183	57.7%	183	57.7%	182	57.4%	140	44.2%
	RI	147	100.0%	126	85.7%	147	100.0%	147	100.0%	147	100.0%	146	99.3%	48	32.7%
	VT	148	100.0%	126	85.1%	1	0.7%	1	0.7%	1	0.7%	0	0.0%	83	56.1%
	Total	2,340	99.3%	2,108	89.5%	1,390	59.0%	1,370	58.1%	1,395	59.2%	1,359	57.7%	1,039	44.1%
02	NJ	2,938	100.0%	2,867	97.6%	2,933	99.8%	2,933	99.8%	2,934	99.9%	2,933	99.8%	1,073	36.5%
	NY	2,094	100.0%	2,081	99.4%	2,037	97.3%	2	0.1%	1,043	49.8%	1,036	49.5%	2,059	98.3%
	PR	281	100.0%	280	99.6%	279	99.3%	280	99.6%	281	100.0%	281	100.0%	275	97.9%
	VI	83	100.0%	82	98.8%	80	96.4%	80	96.4%	82	98.8%	81	97.6%	68	81.9%
	Total	5,402	100.0%	5,310	98.3%	5,329	98.6%	3,295	61.0%	4,341	80.4%	4,331	80.2%	3,475	64.3%
03	DC	15	100.0%	11	73.3%	5	33.3%	5	33.3%	5	33.3%	5	33.3%	11	73.3%
	DE	71	100.0%	61	85.9%	62	87.3%	59	83.1%	61	85.9%	60	84.5%	29	40.8%
	MD	1,025	99.8%	1,011	98.4%	876	85.3%	875	85.2%	847	82.5%	596	58.0%	607	59.1%
	PA	5,726	100.0%	5,722	99.9%	419	7.3%	414	7.2%	411	7.2%	396	6.9%	3,223	56.3%
	VA	2,929	99.9%	2,823	96.2%	291	9.9%	292	10.0%	289	9.9%	283	9.6%	375	12.8%
	WV	3,892	99.9%	3,747	96.2%	142	3.6%	7	0.2%	141	3.6%	136	3.5%	735	18.9%
	Total	13,658	99.9%	13,375	97.9%	1,795	13.1%	1,652	12.1%	1,754	12.8%	1,476	10.8%	4,980	36.4%
04	AL	1,701	100.0%	1,699	99.9%	1,662	97.7%	1,660	97.6%	1,077	63.3%	467	27.5%	1,130	66.4%
	FL	637	100.0%	531	83.4%	345	54.2%	358	56.2%	412	64.7%	324	50.9%	476	74.7%
	GA	1,003	100.0%	987	98.4%	36	3.6%	9	0.9%	7	0.7%	7	0.7%	532	53.0%
	KY	2,150	100.0%	2,150	100.0%	2,149	100.0%	2,134	99.3%	2,144	99.7%	2,110	98.1%	2,133	99.2%
	MS	1,857	100.0%	1,850	99.6%	356	19.2%	479	25.8%	432	23.3%	329	17.7%	437	23.5%
	NC	1,641	100.0%	1,632	99.5%	1,635	99.6%	1,293	78.8%	1,634	99.6%	1,624	99.0%	1,617	98.5%
	SC	777	100.0%	697	89.7%	3	0.4%	776	99.9%	4	0.5%	4	0.5%	131	16.9%
	TN	1,541	99.9%	1,510	97.9%	895	58.0%	122	7.9%	909	58.9%	253	16.4%	1,410	91.4%
	Total	11,307	100.0%	11,056	97.8%	7,081	62.6%	6,831	60.4%	6,619	58.5%	5,118	45.3%	7,866	69.6%
05	IL	2,013	100.0%	1,968	97.8%	1,913	95.0%	1,781	88.5%	1,910	94.9%	1,866	92.7%	1,545	76.8%
	IN	1,394	99.9%	1,390	99.6%	1,370	98.2%	1,351	96.8%	1,363	97.7%	1,299	93.1%	1,192	85.4%
	MI	1,049	100.0%	1,033	98.5%	946	90.2%	937	89.3%	926	88.3%	894	85.2%	737	70.3%
	MN	1,138	100.0%	1,128	99.1%	1,102	96.8%	1,081	95.0%	1,095	96.2%	1,057	92.9%	775	68.1%
	OH	4,081	99.8%	1,970	48.2%	1	0.0%	1	0.0%	1	0.0%	1	0.0%	1,759	43.0%
	WI	927	100.0%	799	86.2%	872	94.1%	812	87.6%	870	93.9%	160	17.3%	761	82.1%
	Total	10,602	99.9%	8,288	78.1%	6,204	58.5%	5,963	56.2%	6,165	58.1%	5,277	49.7%	6,769	63.8%

Source: Integrated Data for Enforcement Analysis (IDEA), 1/11/99 Data Extract from PCS

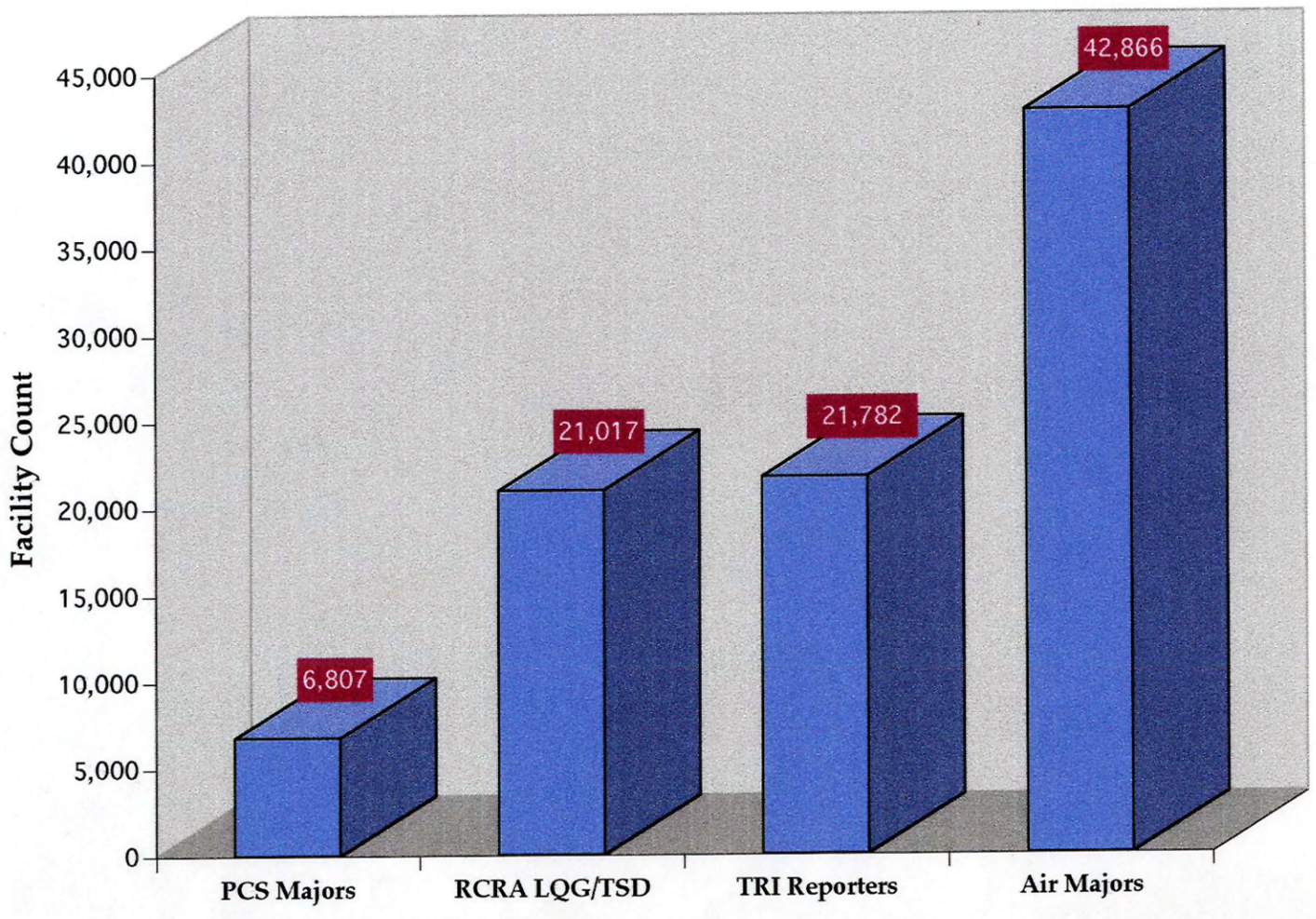
Attachement 4

PCS Data Entry Statistics by State for Active Permitted Dischargers

		Facility Name		City Code		Facility Location Information								Latitude and Longitude	
						Name		Street		City		ZIP			
Region	State	#	%	#	%	#	%	#	%	#	%	#	%	#	%
06	AR	838	100.0%	838	100.0%	834	99.5%	817	97.5%	816	97.4%	413	49.3%	825	98.4%
	LA	6,330	100.0%	6,272	99.1%	2,022	31.9%	2,008	31.7%	1,806	28.5%	1,389	21.9%	1,796	28.4%
	NM	300	99.3%	298	98.7%	56	18.5%	54	17.9%	53	17.5%	42	13.9%	70	23.2%
	OK	769	100.0%	765	99.5%	256	33.3%	420	54.6%	97	12.6%	48	6.2%	138	17.9%
	TX	5,816	100.0%	5,814	99.9%	1,673	28.8%	1,682	28.9%	1,629	28.0%	1,027	17.7%	3,131	53.8%
	Total	14,053	100.0%	13,987	99.5%	4,841	34.4%	4,981	35.4%	4,401	31.3%	2,919	20.8%	5,960	42.4%
07	IA	1,842	100.0%	1,754	95.2%	26	1.4%	25	1.4%	26	1.4%	8	0.4%	105	5.7%
	KS	1,208	99.5%	1,183	97.4%	381	31.4%	388	32.0%	386	31.8%	122	10.0%	58	4.8%
	MO	3,033	100.0%	3,033	100.0%	3,022	99.6%	3,017	99.5%	3,021	99.6%	3,021	99.6%	701	23.1%
	NE	1,270	99.9%	1,204	94.7%	1	0.1%	2	0.2%	1	0.1%	1	0.1%	933	73.4%
	Total	7,353	99.9%	7,174	97.5%	3,430	46.6%	3,432	46.6%	3,434	46.7%	3,152	42.8%	1,797	24.4%
08	CO	545	100.0%	494	90.6%	2	0.4%	393	72.1%	156	28.6%	124	22.8%	126	23.1%
	MT	191	100.0%	190	99.5%	14	7.3%	6	3.1%	7	3.7%	4	2.1%	47	24.6%
	ND	221	100.0%	207	93.7%	11	5.0%	11	5.0%	6	2.7%	5	2.3%	48	21.7%
	SD	409	100.0%	407	99.5%	362	88.5%	365	89.2%	363	88.8%	355	86.8%	156	38.1%
	UT	129	100.0%	127	98.4%	58	45.0%	59	45.7%	56	43.4%	52	40.3%	125	96.9%
	WY	947	100.0%	946	99.9%	931	98.3%	710	75.0%	64	6.8%	4	0.4%	59	6.2%
	Total	2,442	100.0%	2,371	97.1%	1,378	56.4%	1,544	63.2%	652	26.7%	544	22.3%	561	23.0%
09	AS	7	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	1	14.3%
	AZ	190	100.0%	178	93.7%	131	68.9%	126	66.3%	129	67.9%	117	61.6%	145	76.3%
	CA	1,011	100.0%	979	96.8%	1,002	99.1%	954	94.4%	980	96.9%	883	87.3%	327	32.3%
	GU	20	100.0%	0	0.0%	1	5.0%	1	5.0%	1	5.0%	1	5.0%	1	5.0%
	HI	81	100.0%	79	97.5%	30	37.0%	17	21.0%	18	22.2%	9	11.1%	55	67.9%
	JA	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	MW	1	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%
	NI	7	100.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0	0.0%	2	28.6%
	NV	85	100.0%	83	97.6%	79	92.9%	72	84.7%	69	81.2%	47	55.3%	50	58.8%
	Total	1,403	100.0%	1,319	94.0%	1,243	88.6%	1,170	83.4%	1,197	85.3%	1,057	75.3%	581	41.4%
10	AK	343	100.0%	343	100.0%	217	63.3%	210	61.2%	204	59.5%	138	40.2%	147	42.9%
	ID	341	100.0%	341	100.0%	274	80.4%	272	79.8%	276	80.9%	241	70.7%	209	61.3%
	OR	1,318	100.0%	1,313	99.6%	743	56.4%	720	54.6%	734	55.7%	559	42.4%	465	35.3%
	WA	772	100.0%	770	99.7%	540	69.9%	522	67.6%	533	69.0%	502	65.0%	480	62.2%
	Total	2,774	100.0%	2,767	99.7%	1,774	64.0%	1,724	62.1%	1,747	63.0%	1,440	51.9%	1,301	46.9%
Total		71,334	99.9%	67,755	94.9%	34,465	48.3%	31,962	44.8%	31,705	44.4%	26,673	37.4%	34,329	48.1%

Source: Integrated Data for Enforcement Analysis (IDEA), 1/11/99 Data Extract from PCS

Comparing the Number of Major Facilities with National Compliance and Pollutant Data Reporting Requirements



PCS Loadings Data for Major Vs. Minor Dischargers by State, Ranked by the Average Loadings (lb/year) for a Discharger in that State

State	Number of Facilities with Loadings Data in PCS for 1997		Number of Active Facilities in PCS		Percentage of Facilities Having Loadings Data		Total PCS Loadings in Pounds in 1997		Average Loading Per Facility in Pounds in 1997		
	Minors	Majors	Minors	Majors	Minors	Majors	Minors	Majors	Minors	Majors	All
DC	5	4	27	4	18.5%	100.0%	31,715	3,295,574,311	6,343	823,893,578	366,178,447
SD	116	23	609	31	19.0%	74.2%	24,020,001,943	17,491,795	207,068,982	760,513	172,931,610
NV	0	10	176	9	0.0%	111.1%	0	566,878,583	No data	56,687,858	56,687,858
CA	1	200	1,362	238	0.1%	84.0%	990	10,678,618,699	990	53,393,093	53,127,461
MN	673	77	2,117	79	31.8%	97.5%	18,123,580,465	1,362,274,831	26,929,540	17,691,881	25,981,140
FL	203	186	8,352	264	2.4%	70.5%	980,314,919	6,171,145,380	4,829,138	33,178,201	18,384,217
KY	1,517	124	6,658	128	22.8%	96.9%	18,939,857,924	2,799,084,740	12,485,074	22,573,264	13,247,375
OR	0	71	1,556	76	0.0%	93.4%	0	904,655,220	No data	12,741,623	12,741,623
UT	66	33	266	34	24.8%	97.1%	96,842,669	1,048,233,982	1,467,313	31,764,666	11,566,431
AL	0	208	7,662	212	0.0%	98.1%	0	1,891,495,051	No data	9,093,726	9,093,726
TN	559	151	1,981	152	28.2%	99.3%	5,315,789,650	788,476,506	9,509,463	5,221,699	8,597,558
NJ	635	169	2,880	171	22.0%	98.8%	6,194,917,572	486,631,341	9,755,776	2,879,475	8,310,384
MO	14	48	9,277	147	0.2%	32.7%	224,053	483,976,968	16,004	10,082,853	7,809,694
LA	118	239	8,101	248	1.5%	96.4%	1,841,725	2,717,319,114	15,608	11,369,536	7,616,697
MI	406	170	8,251	183	4.9%	92.9%	1,418,697,747	1,503,488,582	3,494,329	8,844,050	5,073,240
PR	129	79	404	101	31.9%	78.2%	119,575,712	737,422,935	926,944	9,334,468	4,120,186
CO	287	97	1,174	106	24.4%	91.5%	1,363,733,689	200,988,612	4,751,685	2,072,048	4,074,798
AZ	5	31	311	41	1.6%	75.6%	22,961,560	119,224,370	4,592,312	3,845,947	3,949,609
AK	15	39	1,263	82	1.2%	47.6%	13,520,142	184,213,201	901,343	4,723,415	3,661,729
HI	0	20	103	27	0.0%	74.1%	0	54,259,512	No data	2,712,976	2,712,976
VI	14	5	93	6	15.1%	83.3%	609,846	47,008,898	43,560	9,401,780	2,506,250
CT	34	106	704	108	4.8%	98.1%	32,096,345	276,043,551	944,010	2,604,184	2,200,999
VA	4	130	2,904	145	0.1%	89.7%	134,001	270,937,861	33,500	2,084,137	2,022,924
WI	11	128	1,425	133	0.8%	96.2%	86,127	266,474,949	7,830	2,081,836	1,917,706
WV	155	96	5,337	97	2.9%	99.0%	4,896,322	459,844,840	31,589	4,790,050	1,851,558
NC	20	220	6,231	221	0.3%	99.5%	4,676,523	387,101,831	233,826	1,759,554	1,632,410
MA	45	138	1,173	151	3.8%	91.4%	33,422,544	236,743,767	742,723	1,715,535	1,476,319
WY	124	22	2,104	28	5.9%	78.6%	187,198,316	14,900,432	1,509,664	677,292	1,384,238
NM	7	26	597	34	1.2%	76.5%	72,708	44,958,863	10,387	1,729,187	1,364,593
WA	6	87	1,469	92	0.4%	94.6%	238,461	124,793,012	39,744	1,434,402	1,344,424
DE	34	30	68	30	50.0%	100.0%	626,882	58,583,368	18,438	1,952,779	925,160
AR	611	110	1,012	110	60.4%	100.0%	41,728,884	610,514,762	68,296	5,550,134	904,638
OH	1,454	283	4,835	283	30.1%	100.0%	244,459,271	1,252,142,009	168,129	4,424,530	861,601
PA	70	385	8,035	388	0.9%	99.2%	3,706,111	373,694,103	52,944	970,634	829,451
GA	118	169	1,515	176	7.8%	96.0%	4,343,591	229,983,600	36,810	1,360,850	816,471
NY	836	360	2,025	363	41.3%	99.2%	105,576,878	846,325,440	126,288	2,350,904	795,905
SC	38	181	1,155	192	3.3%	94.3%	177,573	164,207,213	4,673	907,222	750,615
TX	322	545	7,613	573	4.2%	95.1%	13,491,161	594,177,440	41,898	1,090,234	700,887
MS	765	86	4,285	86	17.9%	100.0%	219,043,571	352,887,317	286,331	4,103,341	672,069
VT	0	34	119	34	0.0%	100.0%	0	21,512,736	No data	632,728	632,728
MD	415	89	1,750	89	23.7%	100.0%	179,076,947	138,487,274	431,511	1,556,037	630,088
IL	1,009	265	10,660	269	9.5%	98.5%	77,348,496	719,355,047	76,659	2,714,547	625,356
IN	992	166	2,995	177	33.1%	93.8%	85,328,560	638,587,483	86,017	3,846,913	625,143
ND	1	23	437	26	0.2%	88.5%	532	14,898,441	532	647,758	620,791
ME	136	96	549	97	24.8%	99.0%	3,484,512	136,783,869	25,621	1,424,832	604,605
MT	109	39	572	44	19.1%	88.6%	19,620,706	59,511,931	180,006	1,525,947	534,680
OK	376	88	1,101	92	34.2%	95.7%	96,608,477	126,348,245	256,937	1,435,776	480,510
NH	12	63	354	69	3.4%	91.3%	137,673	30,526,111	11,473	484,541	408,850
KS	1	18	4,477	57	0.0%	31.6%	6,361	7,384,177	6,361	410,232	388,976
RI	53	26	374	27	14.2%	96.3%	4,376,218	23,846,266	82,570	917,164	357,247
NE	388	60	1,941	60	20.0%	100.0%	111,110,241	44,039,331	286,367	733,989	346,316
ID	113	61	353	68	32.0%	89.7%	6,217,362	25,327,622	55,021	415,207	181,293
IA	670	120	1,923	123	34.8%	97.6%	42,337,762	49,361,247	63,191	411,344	116,075
Total	13,692	6,234	148,447	6,796	9.2%	91.7%	78,134,131,437	44,658,746,769	5,706,554	7,163,739	6,162,445

Numbers in red are questionable because the Average Load for Minors is Greater Than that for Majors.

Note: The percentage of dischargers having loadings data is only approximate, because the number of facilities having loadings data in 1997 is divided by the number of active dischargers as of October 1998 in each state, and not the number of active dischargers in 1997, to calculate the percentage.

Prepared by EPTDD, 11/16/1998

Source: Integrated Data for Enforcement Analysis (IDEA)