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

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OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

MEMORANDUM

Subject: ICIS Addendum to the Appendix of the 1985 Permit Compliance System Policy Statement

From: Michael M. Stahl, Director
Office of Compliance
Office of Enforcement and Compliance Assurance

James A. Hanlon, Director
Office of Wastewater Management
Office of Water

To: Regional Water Division Directors, Regions 1-10

On October 31, 1985, EPA issued the Permit Compliance System (PCS) Policy Statement. Since then, the PCS Policy Statement has been updated numerous times, including the most recent update in 2000. As of August 2006, 21 states, 2 Tribes and 9 territories have been entering their Clean Water Act National Pollutant Discharge Elimination System (NPDES) data into the modernized PCS, the Integrated Compliance Information System for NPDES (ICIS-NPDES). ICIS was designed to incorporate new technology and the full scope of the NPDES program as it has evolved since 1985. This Addendum to the PCS Policy Statement provides an interim approach for ensuring consistency in national NPDES program information during the transition from PCS to ICIS-NPDES.

The PCS Policy Statement defined a list of data elements, known as the Water Enforcement National Data Base (WENDB), required to be entered into PCS. This Addendum specifies the data elements (Attachment 1) in ICIS-NPDES that are comparable to WENDB. Attachment 1 lists the minimum data that the states, territories, tribes and EPA Regions using ICIS-NPDES should currently be entering into ICIS.[1]

The ICIS-NPDES data elements listed in Attachment 1 align as closely as possible to the universes that are relevant to WENDB as specified in the PCS Policy Statement.

[1] ICIS-NPDES was designed to help states, territories, tribes and EPA Regions implement and manage the NPDES program in their jurisdictions. Thus, ICIS-NPDES contains many more data elements than the limited set identified in Attachment 1 for purposes of interim national reporting. We encourage our direct user states, territories, tribes and the EPA Regions to take advantage of the full functionality and breadth of the data elements in ICIS-NPDES.

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However, given the different system architecture between PCS and ICIS-NPDES, the ICIS-NPDES data elements listed in Attachment 1 do not correlate to every WENDB element. Some WENDB data elements do not translate to data elements in ICIS-NPDES; some were split apart into two data elements in ICIS-NPDES; some were combined in ICIS-NPDES; and a few were not included in ICIS-NPDES.

- For example, in PCS, a Concentrated Animal Feeding Operation (CAFO) permit could only be signified by a special character in the third digit of the permit number. ICIS-NPDES allows a CAFO permit to be identified as a unique permit component for a facility. However, when a particular permit component is identified in ICIS-NPDES, the system may require additional fields to be entered. In some situations, the additional data elements are required to save the permit component record, and in other cases, additional data elements may be required only when certain activities are performed for the record to be complete enough to save. In this case, once a facility is identified as having a CAFO permit component, three additional permit data elements associated with a CAFO are required by the system to save that entry. If a CAFO inspection occurs, one additional CAFO-related system-required data element must be entered before the rest of the inspection record will be saved by the data system.

Thus, translating WENDB from PCS to ICIS-NPDES is not a direct match. Overall, while WENDB has 220 data elements, this Addendum (Attachment 1) specifies only 187 data elements that should be entered into ICIS-NPDES during this interim period This Addendum is necessary to ensure national consistency in minimum data expectations while the Agency is managing the national NPDES program with both PCS and ICIS-NPDES. The Agency does not believe that the PCS Policy Statement, even with this Addendum, meets its national need for information to manage the NPDES program. Thus, the Agency is concurrently pursuing a rulemaking approach that will identify a full set of data elements that all implementing agencies of the NPDES program will be required to enter or otherwise flow to ICIS-NPDES.

The PCS Policy Statement, with this Addendum, continues to be in effect for all agencies authorized to implement the NPDES program. Agencies that are still using PCS will continue to follow WENDB, while agencies that have moved from PCS to ICIS will follow the minimum data elements specified in Attachment 1 to this Addendum. EPA expects all users of PCS and ICIS-NPDES to maintain the high standards of timeliness, completeness, and accuracy that have been expected in PCS.

If you have questions regarding this Addendum, you may contact Betsy Smidinger, Deputy Division Director, Enforcement Targeting and Data Division, at (202) 564-4017. The staff contact is Andy Hudock at (202) 564-6032

cc: ICIS-NPDES and PCS Coordinators in States and Regions
Expanded ICIS-NPDES/PCS Steering Committee

Attachment