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

JAN 25 2001

OFFICE OF WATER

MEMORANDUM

SUBJECT: Follow-up to PCS Data Clean-Up Proposal

FROM: Charles H. Sutfin, Director
Water Permits Division

Frederick F. Stiehl, Director
Enforcement Planning, Targeting and Data Division

TO: Water Management Division Directors
Enforcement Management Directors

The Office of Water (OW) and the Office of Enforcement and Compliance Assurance (OECA) are undertaking an effort to enter missing data and QA/QC the data entered in the Permit Compliance System (PCS). As the September 7, 2000, memo (**Attachment 1**) signed by Diane Regas and Sylvia Lowrance points out, these data are used to manage the National Pollutant Discharge Elimination System (NPDES) program and to measure program implementation in achieving environmental goals. Poor data undermines EPA's ability to report permit backlog levels, measure success in meeting Government Performance Results Act (GPRA) commitments, assure the level of compliance by regulated facilities, and implement the Total Maximum Daily Load (TMDL) program. **Attachment 2** to this memo provides instructions for our plan to work with Regions and States to correct and populate PCS with the data necessary to accurately represent the NPDES program. We initially discussed this approach with you and your staff at the Chicago Water Division Directors Meeting in November and the June PCS Steering Committee Meeting.

We have created reports listing the content of PCS for key facility and pipe-level fields for each State, in order to:

- allow States to "see what we see" in PCS and QA/QC the data, if necessary,
- allow EPA to determine whether data for key fields missing in PCS exists outside of PCS (particularly for GIS-related data) in other State systems or databases,

- develop methods to capture missing information to enter in PCS in a manner resulting in the least burden to the States and Regions, and

- allow EPA to determine why a significant amount of data is missing in PCS (e.g., percentage of issuance dates that are missing because the permit has never been issued or lat/long data missing because the outfalls are internal) and devise means to improve our internal and external reporting to account for these factors.

The end result of this exercise should provide a clearer picture of the NPDES universe and the impact of permitted sources on the environment. This clearer picture will improve our ability to accurately reflect the results of program implementation, prioritize the permit issuance process to meet environmental needs, communicate more effectively with the public, and assess resource needs throughout the NPDES program. We hope that another result will be increased confidence and reliance on PCS data among EPA headquarters, Regions, and States. Please call either of us if you have any questions.

Attachments

cc: EPA Regional PCS Coordinators
State PCS Coordinators
EPA Regional NPDES Branch Chiefs
Enforcement Coordinators
State NPDES Program Managers
EPA Regional GIS Coordinators
State GIS Coordinators

Attachment 2

PCS Clean-Up
Overview and Instructions

Poor or missing data undermines EPA's ability to document progress, identify problems, and effectively manage the NPDES program. The Agency needs basic information such as the number of facilities covered under an active NPDES permit within a particular watershed; which facilities are discharging to an impaired waterbody; the number of facilities with permits expiring in 2001; environmental improvement resulting from the NPDES program; and priorities for permit issuance; to oversee and assess implementation. Over the next six months, we hope to work with EPA Regions and States to correct inaccurate data and complete missing data fields where that information is available.

We have attached State reports displaying the current information appearing in key fields in PCS. **(See individual State PCS Reports). Attachment 3** contains a list of the PCS fields queried, along with descriptions and definitions of the codes (look-up tables) for locational metadata. We want States to have an opportunity to view what appears as "reality" in PCS and assist us in identifying, for those data elements specified (Attachment 3), discrepancies between PCS and State data, making corrections where necessary, and filling in the blanks where possible.

The first step in this process is to allow States to review the PCS data elements identified for this effort and identify discrepancies. **Attachment 4**, the PIFT (Permit Issuance Forecasting Tool) Report, highlights the many discrepancies between PCS and State data. The PIFT (See Memo, **Attachment 5**) was developed to allow EPA to assess resource and permit issuance needs. It uses State data, where available, to forecast the number of permits that will be expiring or that will be issued over the next several years. We compared PIFT data to PCS data to show the significant differences that often exist. For example, the State of New Jersey lists 529 minor facilities compared to 2,685 minors in PCS. Nebraska lists 850 minor facilities, compared to 1,183 minors in PCS. It should be noted that for certain States, Regions developed the PIFT reports based on PCS data, resulting in nearly identical datasets. OW and OECA hope to work with States to determine which numbers truly represent the active NPDES universe.

There are many instances of blank fields in PCS. EPA recognizes that many of these fields are intentionally blank (e.g., lat/long data for internal outfalls). Where that is the case, we will work to develop a method by which such fields can be identified and excluded from geo-locational efforts. Where these data exist at the State level, we are hoping to enter them into PCS.

EPA wants to extend as much assistance as possible to States and Regions in this effort. In order to provide the right kind of assistance, we need to determine whether data that are missing exist at all, even outside of PCS. Over the next three months EPA headquarters and contractors will work with Regions and States to determine whether the key elements queried in our State PCS reports exist in any form at the State level. Key elements may exist in several different forms and some elements may fall into more than one category:

1. Data are currently in PCS and are correct
2. Data are currently in PCS, but need additional QA/QC
3. Data are currently in a State system or database, can be uploaded to PCS without data conversion modifications, but are not being uploaded
4. Data are currently in a State system or database, cannot be uploaded to PCS without data conversion modifications
5. Data exist at State level in hardcopy only
6. State does not have data
7. State is part of IDEF project

EPA personnel and contractors plan to complete a data matrix, categorizing the form in which the data elements exist, based on the 7 options above. Where key data exist in State systems or files (e.g., GIS information for outfalls that are currently in a separate State database), we hope to work with States and Regions to populate PCS with that data. If the data are incorrect, we will work with States and Regions to make corrections.

There are several methods by which we can work to correct and/or populate PCS. The data can be entered into PCS at the State, EPA Regional, or EPA headquarters level or it can be uploaded electronically. We want to tailor an approach that will meet everyone's needs. The most expedient way to load the data would be for States to provide the information in electronic format. If the State agrees, we will work to upload this data to PCS, where possible, or to directly enter it into PCS. The format could take almost any form (Excel, Lotus, QuattroPro spreadsheets, Microsoft Access database files, etc.). EPA will also convert State lat/long data, where necessary, from decimal degrees to the format currently used by PCS (degrees, minutes, seconds, tenths of seconds).

As collecting these data and ensuring that they are correct in PCS is extremely important, we wish to give Regions and States every opportunity to provide the information. If the information is not available in electronic format, hard copy may be submitted. If information is not available in either format, EPA contractors may be available to visit State or Regional offices to assist in its compilation.

We are sending the individual **State PCS Reports and Attachments 1-5** to PCS, NPDES, and GIS coordinators at the State and Regional level. EPA personnel and contractors will be contacting you over the next several weeks to determine whether the data elements exist in any form and to identify methods by which the data can be entered into PCS. In the meantime, please feel free to pass on a copy of your State file to any other relevant contact. If you pass this request on to other State or Regional personnel, please provide that person's name and number so we may include them as a contact for this project. Thank you in advance for your help.

If you have any questions or comments regarding the queries or the clean-up project, please do not hesitate to call:

For questions regarding the data currently present in PCS, please contact:

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For questions regarding the PCS cleanup project, please contact:

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