

5. COMPLIANCE AND ENFORCEMENT HISTORY

Until recently, EPA has focused much of its attention on measuring compliance with specific environmental statutes. This approach allows the Agency to track compliance with the Clean Air Act, the Resource Conservation and Recovery Act, the Clean Water Act, and other environmental statutes. Within the last several years, the Agency has begun to supplement single-media compliance indicators with facility-specific, multimedia indicators of compliance. In doing so, EPA is in a better position to track compliance with all statutes at the facility level and within specific industrial sectors.

A major step in building the capacity to compile multimedia data for industrial sectors was the creation of EPA's Integrated Data for Enforcement Analysis (IDEA) system. IDEA has the capacity to "read into" the Agency's single-media databases, extract compliance records, and match the records to individual facilities. The IDEA system can match air, water, waste, toxics/pesticides/EPCRA, Toxics Release Inventory (TRI), and enforcement docket records for a given facility and generate a list of historical permit, inspection, and enforcement activity. IDEA also has the capability to analyze data by geographic area and corporate holder. As the capacity to generate multimedia compliance data improves, EPA will make available more in-depth compliance and enforcement information. Additionally, EPA is developing sector-specific measures of success for compliance assistance efforts.

This chapter uses inspection, violation, and enforcement data from the IDEA system, to provide information about the historical compliance and enforcement activity of the local government sector. While other sector notebooks have used Standard Industrial Classification (SIC) data from the Toxics Release Inventory System (TRIS) to define their data sampling universes, none of the SIC codes associated with local governments identifies facilities required to report to the TRI program. As such, sector-defining data have been provided from EPA data systems linked to EPA's Facility Indexing System (FINDS), which tracks facilities in all media databases. This chapter does not attempt to define the actual number of facilities that fall within each sector. Instead, the chapter portrays the records of a subset of facilities within the sector that are well defined within EPA databases.

As a check on the relative size of the full sector universe, most notebooks contain an estimated number of facilities within the sector according to the Bureau of Census. Census data were not used for the local government sectors because the SIC codes used to identify them are not unique to local government, and the aggregated Census data would not allow differentiation between public and private, or local versus state or federal, operations. A number of alternative sources

were evaluated before deciding to use the Dun and Bradstreet database as the primary reference, supplemented by data from the U. S. Department of Education where appropriate. Since these data sources are not aggregated, facility name and location data can be evaluated to help identify local government facilities. Since the local government sector consists of facilities not typically falling under environmental agency scrutiny (exceptions being water supply and waste/wastewater treatment), the reporting universe within the EPA databases may be small compared to full universe data (in some cases, much smaller). However, the groups selected for inclusion in this data analysis chapter should be consistent with this sector's general makeup.

Before presenting the data, the next section defines general terms and the column heads used in the data tables. The data represent a retrospective summary of inspections and enforcement actions and solely reflect EPA, state, and local compliance assurance activities that have been entered into EPA databases. To identify trends, EPA ran data queries for the past 5 years (July 1, 1993 to June 30, 1998). Other sector notebooks have run both 1-year and 5-year analyses for comparative purposes. Again, because many of the SIC groups within the local government sector have not received much environmental scrutiny, data are not sufficient over a 1-year period to support a meaningful analysis.

The data illustrate the variations across EPA regions for certain sectors. This variation may be attributable to state/local data entry variations, specific geographic concentrations, proximity to population centers, sensitive ecosystems, highly toxic chemicals used in production, or historical noncompliance. Hence, the exhibited data do not rank regional performance or necessarily reflect which regions may have the most compliance problems.

5.1 COMPLIANCE AND ENFORCEMENT DATA DEFINITIONS

5.1.1 General Definitions

Below are the general definitions of terms used in the data tables:

- C *Facility Indexing System (FINDS)* assigns a common facility number to EPA single-media permit records, establishing a *linkage* capability to the permit data. The FINDS identification number allows EPA to compile and review all permit, compliance, enforcement, and pollutant release data for any given regulated facility.

- C *Integrated Data for Enforcement Analysis (IDEA)* is a data integration system that can retrieve information from the major EPA program office databases. IDEA uses the

FINDS identification number to link separate data records from EPA's databases. This allows retrieval of records from across media or statutes for any given facility, thus creating a "master list" of records for that facility. Some of the data systems accessible through IDEA are AFS (Air Facility Indexing and Retrieval System, Office of Air and Radiation), PCS (Permit Compliance System, Office of Water), RCRIS (Resource Conservation and Recovery Information System, Office of Solid Waste), NCDB (National Compliance Data Base, Office of Prevention, Pesticides, and Toxic Substances), CERCLIS (Comprehensive Environmental and Liability Information System, Superfund), and TRIS. IDEA also contains information from outside sources, such as Dun and Bradstreet (DUN) and the Occupational Safety and Health Administration. Most data queries displayed in this section were conducted using IDEA.

5.1.2 Data Table Column Heading Definitions

Below are the following general definitions of terms used in the data tables:

- C **Column A: Region**—Is the EPA Region for which data are summarized.
- C **Column B: Facilities in Universe**—Is based on an analysis of the Dun and Bradstreet Marketing Identifier (DMI) database within the listed SIC code range. The DMI tracks more than 11 million currently operating public and private business entities. Data records were retrieved by SIC code and then screened for business name keywords indicative of local government operations. The SIC code range selected for each search is defined by each notebook's selected SIC code coverage. While this method in no way provides exact sector universe numbers, it does allow for reasonable approximations from a uniform, verifiable source. The one exception to using DMI was in approximating the elementary and secondary schools universe (SIC code 8211) and public library universe (SIC code 8231). Data used for these sectors came from the 1995-1996 Public Elementary and Secondary School Universe and FY1994 Public Library Survey, as compiled by the U. S. Department of Education, National Center for Education Statistics.
- C **Column C: Facilities in Search**—Is based on the universe of FINDS-linked facilities within the listed SIC code range. SIC codes were tested from AFS, PCS, RCRIS, NCDB, and DUN, with a match from any one database qualifying the facility for

inclusion. This subset of facilities with links to Agency databases is used to derive the data in Columns D through K.

- C **Column D: Facilities Inspected**—Indicates the level of EPA and state agency inspections for the facilities in this data search. These values show what percentage of the facility universe is inspected in a 5-year period.
- C **Column E: Number of Inspections**—Measures the total number of inspections conducted in this sector. An inspection event is counted each time it is entered into a single media database.
- C **Column F: Average Time Between Inspections**—Provides an average length of time, expressed in months, between compliance inspections for all facilities within the defined universe.
- C **Column G: Facilities with One or More Enforcement Actions**—expresses the number of facilities that were the subject of at least one enforcement action within the defined time period. This category is broken down further into federal and state actions. Data are obtained for administrative, civil/judicial, and criminal enforcement actions. A facility with multiple enforcement actions is only counted once in this column (e.g., a facility with three enforcement actions counts as one facility).
- C **Column H: Total Enforcement Actions**—Describes the total number of enforcement actions identified for a sector across all environmental statutes within the defined time period. A facility with multiple enforcement actions is counted multiple times (e.g., a facility with three enforcement actions counts as three).
- C **Column I: State Lead Actions**—Shows what percentage of the total enforcement actions are taken by state and local environmental agencies. Varying levels of use by states of EPA data systems may limit the volume of actions recorded as state enforcement activity. Some states extensively report enforcement activities into EPA data systems, while other states may use their own data systems.
- C **Column J: Federal Lead Actions**—Shows what percentage of the total enforcement actions are taken by EPA. This value includes referrals from state agencies. Many of these actions result from coordinated or joint state/federal efforts.

- C **Column K: Enforcement to Inspection Rate**—Is a ratio of enforcement actions to inspections and is presented for comparative purposes only. This ratio is a rough indicator of the relationship between inspections and enforcement. It relates the number of enforcement actions and the number of inspections that occurred within the 5-year period. This ratio includes the inspections and enforcement actions reported under the CWA, CAA and RCRA. Inspections and actions from the TSCA/FIFRA/EPCRA database are not factored into this ratio because most of the actions taken under these programs are not the result of facility inspections. Also, this ratio does not account for enforcement actions arising from non-inspection compliance monitoring activities (e.g., self-reported water discharges) that can result in enforcement action.

5.2 LOCAL GOVERNMENT COMPLIANCE HISTORY

Exhibit 5-1 presents the 5-year inspection and enforcement summary by statute for local government SIC groups. This exhibit provides an overview of the reported compliance and enforcement data for SIC codes over the past 5 years (July 1993 to June 1998). As shown in the table, approximately 90 percent (79,725) of the 88,619 inspections conducted over the 5-year period were conducted under the Clean Water Act. From the total 88,619 inspections, EPA took 4,961 enforcement actions. A total 5.6 percent of all inspections conducted of local government operations resulted in an enforcement action. Nearly 80 percent (3,916) of all enforcement actions were taken under the Clean Water Act. Other points of interest include:

- C Sewerage systems (SIC code 4952) have received the most inspections of any local government operation, with 67,444 inspections over the 5 years. This translates to each facility being inspected an average of seven to eight times over the 5-year period. Ninety-eight percent of these inspections were conducted under the Clean Water Act. From those 67,444 inspections, EPA took 4,037 enforcement actions. On average, 6 percent of all inspections resulted in an enforcement action. (It should be noted that this number could be lower since one facility may have had numerous enforcement actions taken against it within the 5-year period.)
- C Elementary and secondary schools (SIC code 8211) received a total of 9,587 inspections over the 5 years, which is the second largest number of inspections across all SIC codes. These inspections were spread across the statutes, with more than half (53 percent) being conducted under the Clean Water Act. The 9,587 inspections resulted in 237 enforcement actions. On average, 2 percent of all inspections resulted in an

enforcement action. Sixty-eight percent of these enforcement actions were taken under the Clean Water Act.

Exhibits 5-2 through 5-17 present the compliance and enforcement data for each of the specific local government operation SIC codes over the same 5-year period. These data are also broken out by EPA region, thereby allowing geographical comparisons. Exhibit 5-18 presents the compliance and enforcement data specifically for public water systems owned by local governments. This information was taken from EPA's Safe Drinking Water Information System (SDWIS), which is not a part of the IDEA system. Like the exhibits that precede it, this exhibit displays the data by region to allow for geographical comparisons.

Exhibit 5-1. Five-Year Inspection and Enforcement Summary by Statute for Local Government SIC Groups

Industry Sector	Facilities Inspected	Total Inspections	Total Enforcement Actions	Clean Air Act		Clean Water Act		RARA		FIFRA/TSCA/EPCRA/Other	
				% of Total Inspections	% of Total Actions	% of Total Inspections	% of Total Actions	% of Total Inspections	% of Total Actions	% of Total Inspections	% of Total Actions
Water Supply (1)	914	4,062	167	10%	12%	87%	82%	3%	3%	0%	3%
Sewerage Systems	8,744	67,444	4,037	2%	2%	98%	97%	0%	0%	0%	1%
Refuse Systems	474	2,607	197	34%	25%	53%	63%	12%	10%	1%	2%
Sanitary Systems, NEC	31	236	12	7%	0%	86%	92%	6%	8%	1%	0%
Amusement & Recreation Services, NEC	41	123	13	9%	0%	80%	100%	7%	0%	3%	0%
Elementary & Secondary Schools	4,410	9,587	237	19%	5%	53%	68%	3%	5%	24%	22%
Libraries	30	124	19	6%	0%	85%	100%	6%	0%	2%	0%
Police Protection	81	373	37	6%	0%	70%	97%	23%	3%	1%	0%
Fire Protection	68	305	29	6%	0%	80%	97%	14%	3%	0%	0%
Public Order & Safety, NEC	15	62	3	10%	67%	55%	0%	35%	33%	0%	0%
Administration of Education Programs	365	508	25	7%	8%	19%	40%	4%	0%	71%	52%
Air & Water Resource & Solid Waste Management	319	2,809	167	12%	13%	83%	82%	5%	4%	0%	1%
Land, Mineral, Wildlife, & Forest Conservation	39	179	6	1%	0%	89%	83%	10%	17%	1%	0%
Administration of Housing Programs	48	120	4	40%	25%	40%	0%	17%	75%	3%	0%
Administration of Urban Planning & Community & Rural Development	18	68	6	13%	0%	62%	33%	22%	67%	3%	0%
Regulation, Licensing, & Inspection of Miscellaneous Commercial Sites	2	12	2	0%	0%	92%	100%	8%	0%	0%	0%

(1) Exhibits 5-18 presents compliance and enforcement data under the Safe Drinking Water Act for public water systems is presented in Exhibit 5-18.

**Exhibit 5-2. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 4941 - Water Supply**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	442	105	28	111	57	4	7	29%	71%	0.06
II	420	191	95	344	33	19	31	94%	6%	0.09
III	595	339	138	1,041	20	9	21	52%	48%	0.02
IV	1,510	547	278	1,094	30	37	46	89%	11%	0.04
V	851	615	160	713	52	16	20	95%	5%	0.03
VI	1,677	93	30	131	43	12	21	48%	52%	0.16
VII	405	113	55	176	39	3	3	100%	0%	0.02
VIII	344	105	42	184	34	2	3	100%	0%	0.02
IX	1,062	102	63	189	32	4	4	100%	0%	0.02
X	372	132	25	79	>60	8	11	100%	0%	0.14
TOTAL	7,678	2,342	914	4,062	35	114	167	80%	20%	0.04

**Exhibit 5-3. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 4952 - Sewerage Systems**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	442	105	28	111	57	4	7	29%	71%	0.06
II	420	191	95	344	33	19	31	94%	6%	0.09
III	595	339	138	1,041	20	9	21	52%	48%	0.02
IV	1,510	547	278	1,094	30	37	46	89%	11%	0.04
V	851	615	160	713	52	16	20	95%	5%	0.03
VI	1,677	93	30	131	43	12	21	48%	52%	0.16
VII	405	113	55	176	39	3	3	100%	0%	0.02
VIII	344	105	42	184	34	2	3	100%	0%	0.02
IX	1,062	102	63	189	32	4	4	100%	0%	0.02
X	372	132	25	79	>60	8	11	100%	0%	0.14
TOTAL	28,964	13,142	8,744	67,444	12	2,181	4,037	55%	45%	0.06

**Exhibit 5-4. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 4953 - Refuse Systems**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	35	81	11	46	>60	2	3	0%	100%	0.07
II	128	79	36	307	15	20	71	85%	15%	0.23
III	97	145	78	746	12	15	28	68%	32%	0.04
IV	212	162	93	450	22	15	25	84%	16%	0.06
V	245	85	50	395	13	15	21	57%	43%	0.05
VI	112	87	34	138	38	8	25	20%	80%	0.18
VII	69	314	106	230	82	7	9	78%	22%	0.04
VIII	38	35	11	44	48	2	2	100%	0%	0.05
IX	68	40	32	122	20	4	6	100%	0%	0.05
X	44	69	23	129	32	6	7	71%	29%	0.05
TOTAL	1,048	1,097	474	2,607	25	94	197	70%	30%	0.08

**Exhibit 5-5. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 4959 - Sanitary Services, not Elsewhere Classified**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	4	1	0	0	--	0	0	0%	0%	--
II	19	8	2	13	37	0	0	0%	0%	--
III	16	12	6	68	11	4	6	83%	17%	0.09
IV	30	6	3	24	15	0	0	0%	0%	--
V	42	35	13	100	21	5	6	83%	17%	0.06
VI	11	0	0	0	--	0	0	0%	0%	--
VII	9	5	1	17	18	0	0	0%	0%	--
VIII	8	5	1	1	>60	0	0	0%	0%	--
IX	17	9	5	13	42	0	0	0%	0%	--
X	4	6	0	0	--	0	0	0%	0%	--
TOTAL	160	87	31	236	22	9	12	83%	17%	0.05

**Exhibit 5-6. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 7999 - Amusement and Recreation Services, not Elsewhere Classified**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	131	3	0	0	--	0	0	0%	0%	--
II	330	7	2	2	>60	0	0	0%	0%	--
III	485	14	5	20	42	1	2	100%	0%	0.10
IV	700	16	12	28	34	0	0	0%	0%	--
V	1,185	21	7	11	>60	0	0	0%	0%	--
VI	551	12	4	32	23	1	4	50%	50%	0.13
VII	356	14	4	10	>60	0	0	0%	0%	--
VIII	264	5	4	17	18	1	7	86%	14%	0.41
IX	433	5	1	1	>60	0	0	0%	0%	--
X	185	11	2	2	>60	0	0	0%	0%	--
TOTAL	4,620	108	41	123	53	3	13	77%	23%	0.11

**Exhibit 5-7. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 8211 - Elementary and Secondary Schools**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	4,836	957	303	416	>60	4	7	29%	71%	0.02
II	8,098	1,070	330	609	>60	67	53	60%	40%	0.09
III	7,644	3,192	1,323	3,222	59	13	15	33%	67%	0.00
IV	13,027	1,543	745	2,680	35	63	72	90%	10%	0.03
V	18,150	2,052	594	1,252	>60	49	51	39%	61%	0.04
VI	11,877	666	317	386	>60	15	27	56%	44%	0.07
VII	6,812	789	402	549	>60	7	6	17%	83%	0.01
VIII	5,218	357	151	211	>60	2	2	50%	50%	0.01
IX	9,814	589	49	50	>60	2	2	50%	50%	0.04
X	3,881	671	196	212	>60	1	2	100%	0%	0.01
TOTAL	89,357	11,886	4,410	9,587	>60	223	237	61%	39%	0.02

**Exhibit 5-8. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 8231 - Libraries**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	1,300	6	1	5	>60	1	1	100%	0%	0.20
II	1,578	17	4	4	>60	0	0	0%	0%	--
III	1,493	30	3	22	>60	1	1	100%	0%	0.05
IV	2,297	10	9	32	19	2	5	40%	60%	0.16
V	3,340	17	5	37	28	0	0	0%	0%	--
VI	1,584	7	4	13	32	3	12	0%	100%	0.92
VII	1,377	9	1	1	>60	0	0	0%	0%	--
VIII	667	3	3	10	18	0	0	0%	0%	--
IX	1,372	41	0	0	--	0	0	0%	0%	--
X	779	0	0	0	--	0	0	0%	0%	--
TOTAL	15,787	140	30	124	>60	7	19	21%	79%	0.15

**Exhibit 5-9. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9221 - Police Protection**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	615	7	1	10	45	0	0	0%	0%	--
II	717	12	6	29	25	1	1	100%	0%	0.03
III	633	47	12	54	52	0	0	0%	0%	--
IV	1,243	25	19	107	14	1	1	100%	0%	0.01
V	1,483	24	7	35	41	0	0	0%	0%	--
VI	1,107	25	15	71	21	9	28	0%	100%	0.39
VII	488	13	5	12	>60	1	1	100%	0%	0.08
VIII	286	12	6	23	31	2	4	100%	0%	0.17
IX	563	14	4	17	49	2	2	100%	0%	0.12
X	268	11	6	15	44	0	0	0%	0%	--
TOTAL	7,403	190	81	373	31	16	37	24%	76%	0.10

**Exhibit 5-10. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9224 - Fire Protection**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	795	14	2	11	>60	0	0	0%	0%	--
II	1,534	32	8	50	38	0	0	0%	0%	--
III	1,787	35	6	15	>60	0	0	0%	0%	--
IV	2,368	22	14	71	19	2	2	100%	0%	0.03
V	1,748	24	7	27	53	1	1	100%	0%	0.04
VI	1,158	23	14	72	19	6	20	0%	100%	0.28
VII	380	10	3	10	60	1	1	100%	0%	0.10
VIII	333	6	3	11	33	1	3	100%	0%	0.27
IX	712	13	4	15	52	1	1	100%	0%	0.07
X	478	25	7	23	>60	1	1	0%	100%	0.04
TOTAL	11,293	204	68	305	40	13	29	28%	72%	0.10

**Exhibit 5-11. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9229 - Public Order and Safety, not Elsewhere Classified**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	18	21	2	4	>60	3	3	100%	0%	0.75
II	52	4	1	2	>60	0	0	0%	0%	--
III	42	6	5	26	14	0	0	0%	0%	--
IV	95	5	3	25	12	0	0	0%	0%	--
V	96	2	1	1	>60	0	0	0%	0%	--
VI	65	2	0	0	--	0	0	0%	0%	--
VII	29	1	1	2	30	0	0	0%	0%	--
VIII	13	1	1	1	60	0	0	0%	0%	--
IX	41	1	1	1	60	0	0	0%	0%	--
X	19	4	0	0	--	0	0	0%	0%	--
TOTAL	470	47	15	62	45	3	3	100%	0%	0.05

**Exhibit 5-12. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9411 - Administration of Education Programs**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	400	29	12	22	>60	1	3	0%	100%	0.14
II	265	62	21	66	56	3	9	89%	11%	0.14
III	194	44	26	80	33	1	1	0%	100%	0.01
IV	373	42	32	37	>60	0	0	0%	0%	--
V	972	143	56	65	>60	9	9	0%	100%	0.14
VI	602	108	57	59	>60	0	0	0%	0%	--
VII	732	134	90	99	>60	2	2	0%	100%	0.02
VIII	495	43	21	22	>60	0	0	0%	0%	--
IX	483	53	16	21	>60	1	1	100%	0%	0.05
X	304	74	34	37	>60	0	0	0%	0%	--
TOTAL	4,820	732	365	508	>60	17	25	36%	64%	0.05

**Exhibit 5-13. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9511 - Air and Water Resource and Solid Waste Management**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	195	66	40	420	9	17	33	15%	85%	0.08
II	284	54	40	366	9	17	44	55%	45%	0.12
III	466	65	54	690	6	7	9	67%	33%	0.01
IV	540	56	40	294	11	8	14	86%	14%	0.05
V	483	67	54	457	9	13	20	55%	45%	0.04
VI	393	32	15	69	28	10	22	5%	95%	0.32
VII	176	19	11	88	13	1	1	100%	0%	0.01
VIII	160	30	20	117	15	5	9	78%	22%	0.08
IX	381	54	38	228	14	9	10	70%	30%	0.04
X	129	41	7	80	31	2	5	100%	0%	0.06
TOTAL	3,207	484	319	2,809	10	89	167	47%	53%	0.06

**Exhibit 5-14. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9512 - Land, Mineral, Wildlife, and Forest Conservation**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	220	1	0	0	--	0	0	0%	0%	--
II	285	13	8	27	29	1	1	100%	0%	0.04
III	99	3	0	0	--	0	0	0%	0%	--
IV	154	12	9	51	14	2	3	100%	0%	0.06
V	428	22	12	56	24	0	0	0%	0%	--
VI	118	3	1	9	20	0	0	0%	0%	--
VII	90	8	1	2	>60	0	0	0%	0%	--
VIII	94	5	5	29	10	1	1	100%	0%	0.03
IX	114	4	2	3	>60	1	1	100%	0%	0.33
X	45	2	1	2	60	0	0	0%	0%	--
TOTAL	1,647	73	39	179	24	5	6	100%	0%	0.03

**Exhibit 5-15. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9531 - Administration of Housing Program**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	354	70	6	10	>60	0	0	0%	0%	--
II	480	35	6	6	>60	0	0	0%	0%	--
III	263	15	11	55	16	1	1	100%	0%	0.02
IV	645	45	15	23	>60	1	2	100%	0%	0.09
V	466	18	5	18	60	0	0	0%	0%	--
VI	484	4	3	3	>60	0	0	0%	0%	--
VII	152	3	1	4	45	1	1	0%	100%	0.25
VIII	89	3	1	1	>60	0	0	0%	0%	--
IX	167	3	0	0	--	0	0	0%	0%	--
X	86	11	0	0	--	0	0	0%	0%	--
TOTAL	3,186	207	48	120	>60	3	4	75%	25%	0.03

**Exhibit 5-16. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9532 - Administration of Urban Planning and Community and Rural Development**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	154	1	0	0	--	0	0	0%	0%	--
II	232	5	1	1	>60	1	1	100%	0%	1.00
III	182	8	3	11	44	1	1	100%	0%	0.09
IV	278	18	6	23	47	1	2	50%	50%	0.09
V	228	5	1	4	>60	0	0	0%	0%	--
VI	144	1	1	5	12	0	0	0%	0%	--
VII	49	1	0	0	--	0	0	0%	0%	--
VIII	93	3	2	2	>60	0	0	0%	0%	--
IX	129	5	3	13	23	1	1	100%	0%	0.08
X	48	17	1	9	>60	1	1	100%	0%	0.11
TOTAL	1,537	64	18	68	>60	5	6	83%	17%	0.09

**Exhibit 5-17. Five-Year Enforcement and Compliance Summary for the Local Government Sector
SIC Code 9651 - Regulation, Licensing, and Inspection of Miscellaneous Commercial Sites**

A	B	C	D	E	F	G	H	I	J	K
Region	Facilities in Universe	Facilities in Search	Facilities Inspected	Number of Inspections	Average Months Between Inspections	Facilities with 1 or More Enforcement Actions	Total Enforcement Actions	Percent State Lead Actions	Percent Federal Lead Actions	Enforcement to Inspection Rate
I	8	0	0	0	--	0	0	0%	0%	--
II	21	0	0	0	--	0	0	0%	0%	--
III	35	1	1	7	9	0	0	0%	0%	--
IV	46	0	0	0	--	0	0	0%	0%	--
V	43	0	0	0	--	0	0	0%	0%	--
VI	26	1	1	5	12	1	2	0%	100%	0.40
VII	13	0	0	0	--	0	0	0%	0%	--
VIII	8	0	0	0	--	0	0	0%	0%	--
IX	23	2	0	0	--	0	0	0%	0%	--
X	5	0	0	0	--	0	0	0%	0%	--
TOTAL	228	4	2	12	20	1	2	0%	100%	0.17

Exhibit 5-18 . SDWIS Enforcement and Compliance Summary Information Reported for Local Government-Owned Public Water Systems

Region	Facilities in Universe	Facilities in Search	Number of Visits *	Total Enforcement Actions **	% State Lead	% Federal Lead
I	22,499	2,083	722	3,897	99%	1%
II	36,155	3,669	1,891	4,521	95%	5%
III	38,443	4,778	535	9,575	98%	2%
IV	57,558	6,939	3,672	14,863	97%	3%
V	106,252	10,865	6,060	27,908	98%	2%
VI	28,233	5,715	638	8,138	95%	5%
VII	12,979	4,447	1,620	13,459	99%	1%
VIII	13,623	2,056	836	6,277	97%	3%
IX	20,139	2,444	251	1,591	76%	24%
X	20,607	3,184	267	4,313	97%	3%
<p>* Number of visits is not a required field in SDWIS; much of the data are not reported by the states.</p> <p>** Number of enforcement actions is a required field in SDWIS; therefore, there is no relationship between number of visits and number of enforcement actions.</p>						