

The State of Utah has completed the data verification for the 2009 State Review Framework CWA data. We have made the appropriate corrections to the Major Facility Count and changed a Judicial action for Parley's Water Treatment Plant to an Administrative Order. We have found differences in the counts of minor permits. EPA Headquarters have counted our Biosolids permits, which are not coded for DMR's, we do however, have them coded for Biosolids Annual Reports. Most of our biosolids permits have been combined with Major Permits as a component. We do not think that biosolids should be counted as separate permits. EPA Indian Tribe permits and MS4 permits have been included in the count for minor permits. The SRF says we have 124 minor permits and Utah thinks the count should be 88.

We have found that the count of non-major general permits differ greatly. We see the problem as counting (inactive facilities) as (active) especially in the Storm Water Industrial and Construction Storm Water areas. The count has also included many Storm Water Construction permits as being active when they are generally short-term permits. We have terminated quite a few but haven't been able to clean up all of the inactive Storm Water Construction permits. Considering the comments above we believe that 980 is more accurate than 1259.

We agree with the dollar amount of penalties collected, but they do not reflect our SEPs. We also agree with the number of enforcement actions. We have found differences in the count of inspections. The SRF says we have had only 16 compliance monitoring actions to Majors. The SRF pull shows that Pretreatment inspections have been included in their count of major inspections. We do have 7 Reconnaissance inspections of Majors, which we feel should be counted which makes the inspection count 23. The whole metric for other inspection counts seems to be inaccurate when the pulls are examined.

We haven't been able to verify the informational metrics, like the count of DMRs entered verses DMR forms expected.