### US Environmental Protection Agency 2007 Annual Noncompliance Report National Pollutant Discharge Elimination System Non-Majors

CALENDAR YEAR 2007 FINAL REPORT (July 2, 2009)

### **Overview**

This report provides summary, state level information on the frequency of violations and associated enforcement actions by National Pollutant Discharge Elimination System (NPDES) permitting authorities for smaller Clean Water Act (CWA) direct discharge permittees. This report covers January 1, 2007 to December 31, 2007 (CY2007).

### **Background on CWA NPDES Program**

In 1972, the Clean Water Act (CWA) was enacted. One important element of the CWA is to prohibit the discharge of pollutants from point sources into waters of the United States, unless authorized by a permit. CWA Section 402 created the National Pollutant Discharge Elimination System (NPDES) permit program. The program gives the EPA the authority to regulate discharges into the nation's waters by setting limits on the effluent that can be introduced into a body of water from an operating and permitted facility. EPA authorizes states to be the primary regulatory agency administering the NPDES program. When a state is authorized, basic program management responsibilities are outlined in the regulations. For example, the regulatory authority is required to track and monitor the compliance status of all NPDES facilities. Although a state may be the primary regulatory agency administering the NPDES program. There are six states (AK,DC, ID, MA, NH, NM) and many territories where EPA remains the permitting authority.

NPDES permitted facilities that discharge through a pipe are required to report Discharge Monitoring Reports (DMRs). DMRs are forms provided by NPDES facilities disclosing selfmonitoring results to the regulatory agency administering the NPDES program. DMRs are typically submitted monthly. When the permitting authority receives the forms and enters the information into national databases, the data system will automatically determine violations discovered through DMRs – providing detailed information about compliance for each facility. There are approximately 6,600 majors and about 39,000 non-majors that have individual permits and submit DMRs. Many facilities have multiple pipes and multiple effluents that are monitored. EPA has required permitting authorities to enter DMR data for only the 6,600 largest dischargers in the country, while strongly suggesting that data for smaller sources be entered.<sup>1</sup>

<sup>1</sup> As part of the NPDES program, facilities are designated as either a Major or a Non-Major permittee. A major municipal facility includes those with design flows of greater than one million gallons per day and facilities with EPA and State approved industrial pretreatment programs. Major industrial facilities are determined based on specific ratings criteria developed by the EPA and State. Major facilities are required to provide data to the regulatory authority and national database on compliance status on a routine basis. A non-major facility must have a municipal discharge of less than one million gallons per day, must not have an industrial waste pretreatment program, and must not be designated as an industrial discharger by the regulatory authority.

In nearly all states, the public can examine compliance and violation records for "major" permittees using EPA's Enforcement and Compliance History Online (ECHO) web page. The availability of compliance data for other facilities, referred to as "non-majors," varies greatly across states – some states submit complete information, others submit very little. To provide EPA and the public with a complete national picture of noncompliance and enforcement across the country, 40 CFR 123.45 requires the director of the permit-issuing authority to submit summary data about compliance, violations and enforcement at non-major facilities. EPA uses this information to produce this Annual Noncompliance Report.

### **Information Reported**

### Regional and State Reporting Criteria

40 CFR 123.45 specifies seven reporting items that the director of the permit-issuing authority is required to submit to EPA. The seven reporting items cover a period from January 1 - December 31, 2007 (CY2007). EPA headquarters requested the data from the NPDES permitting authorities on February 12, 2009. The deadline for submission of the data was March 31, 2009. States were asked to submit their reports to EPA Regions according to the format shown in the table below:

Item	Description	Count
1)	Number of non-major NPDES permittees (standard/individual permits only)	
2)	Number of non-major NPDES permittees reviewed by the state/ Region	
3)	Number of non-major NPDES permittees in Category I non-compliance	
4)	Number of non-major NPDES permittees in Category II non-compliance <sup>2</sup>	*
5)	Number of formal enforcement actions taken by the state/ Region against non-major NPDES permittees	
6)	Number of permit modifications extending compliance deadlines granted to non-major NPDES permittees	
7)	List of non-major NPDES permittees which are one or more years behind in construction phases of the compliance schedule, in alphabetical order by name and permit number	Please enclose a list.

Table 1. Annual Non-Compliance Report for NPDES Non-Majors

\*The regulation requires states to delineate the severity of violations by providing separate figures for lines 3 and 4. However, many states that report manually indicated their data systems were not able to provide these distinctions. For this reporting cycle, the EPA has allowed states to provide one combined figure for lines 3 and 4. This is not the preferred reporting method, but is preferable to having no reporting.

<sup>&</sup>lt;sup>2</sup> As stated in 40 CFR 123.45(c), "The statistical information shall be organized to follow the types of noncompliance listed in paragraph (a) of this section." Section (a)(2)(iii)(A)(1) states that Category II noncompliance includes any violation of a permit limit.

### **Universe of Facilities Covered by ANCR**

Of the approximately 39,000 non-major permittees covered under the ANCR, there were about 31,000 that were reviewed for compliance by the states in CY2007. Reviewed can mean either that the permit limits and DMRs were put into a database so that violations were automatically determined, or that the state performed a manual review of reports or other monitoring activities (such as an inspection). Approximately 8,000 facilities were excluded from compliance rate analysis because they were not evaluated by the permitting authority in CY2007.

## **Noncompliance Categories**

Significant noncompliance (SNC) is a term used to describe <u>major</u> facilities that have serious violations – it is determined by a fairly complex calculation of violations over time. Facilities can be in SNC for failure to submit DMRs, not completing a court-ordered compliance schedule on time, or by violating effluent limits in their permit. The CWA regulations define two types of CWA effluents - toxics and conventionals. The SNC standard is based on this regulation. Violations that are 20% or more over limit for toxics and 40% or more over limit for conventionals will trigger an SNC status. For CWA <u>non-major</u> facilities, EPA applies the same review criteria for violations, but uses different terminology. A "SNC-level" effluent violation for a non-major is called "Category I" and other violations are considered "Category II." This terminology comes from the CWA regulations (40CFR 123.45).

### **Reporting Method for Collecting Data**

The ANCR data is divided into groups (shown as colored bands on the following ANCR table) to allow the user to understand the method of calculation. The states in the first two groups are submitting DMR information into the national database on a regular basis – thus their information is primarily derived from national database extracts. The other states provide EPA with data that has no supporting or underlying information (meaning that the national systems generally do not record which facilities had violations). The groups appear in the report in the following order:

*Automated (Green on data table)* - This group represents the states that accepted the national database numbers with no changes. This group of states averaged 88% of DMR data in the national system. ECHO data for these states are generally well-populated for the purposes of the Annual Noncompliance Report.

Automated with Adjustments (Blue on data table Group) - Similar to the Automated Group, this group also had a very high rate of DMR entry into the national system. When these states performed quality assurance review of the data in the national system, they made some minor

manual adjustments to their numbers. ECHO data for these states is generally well-populated for the purposes of the Annual Noncompliance Report.

*Full Manual Reporting (Orange on data table Group)* – Data from this group of states are not well populated in the national system. As a result, the state provided manual reporting for its information. Some of these states may have their own databases allowing them to produce their own statistics. States in this category were able to break out their more significant category I violations, from all other violations (category II).

*Partial Manual Reporting (Yellow on data table Group)* - Data from this group of states are not well populated in the national system. As a result, the state provided manual reporting for its information. Some of these states may have their own databases allowing them to produce their own statistics. These states were not able to classify the severity of violations. As a result, the state reports the total number of facilities in violation, but not information broken out by Category I and II.

Did Not Report (Red Group) – Vermont did not report as required under the regulations.

EPA produced an interim version of the ANCR data table on May 5, 2009. Three states (WY, IL, and TX) reported corrected numbers after the interium version was completed, which are reflected in this report. The revised numbers and percentages are identified in red text on the ANCR data table.

### Data Table 2. Clean Water Act- 2007 Annual Noncompliance Report (ANCR) Data Table

Data Table 2. Clea	an mater Act-	Loor Annua								July 2, 2009	
						Total					
			% NonMajors			NonMajors in		<b>Total Category I</b>			
			Reviewed by			Category I or	Total Non-	Non-Compliance		Permit Mods.	
		Non Majors	the		Additional Non-	Category II, of	<b>Compliance Rate</b>	Rate for	Formal	Extending	
	Non Majors	Reviewed by	state/Region in	Non-complying	complying	those with	for NonMajors	NonMajors with	Enforcement	Compliance	Schedule-
	Facility	the	PCS or ICIS-	NonMajors In	NonMajors in	Limits and	with Limits and	Limits and	Actions for	Deadline for	NonCompliant
State <sup>1</sup>	Universe	state/Region <sup>2</sup>	NPDES	Category I	Category II only	Current DMRs	Current DMRs	Current DMRs <sup>3</sup>	NonMajors	NonMajors	NonMajors <sup>4</sup>
Data Source: Automa	ted (National Da	atabase with N	o Changes by st	ate/Region)							
CO	247	209	84.62%	133	66	199	95.22%	63.64%	12	11	153
СТ	79	76	96.20%	11	6	17	22.37%	14.47%	1	C	0
DE	35	30	85.71%	1	15	16	53.33%	3.33%	0	C	0
MA	157	136	86.62%	119	3	122	89.71%	87.50%	1	C	4
ME	272	192	70.59%	117	67	184	95.83%	60.94%	1	C	) 11
MT	189	176	93.12%	104	13	117	66.48%	59.09%	1	C	) 14
NE	632	600	94.94%	303	39	342	57.00%	50.50%	3	C	2
NH	46	33	71.74%	32	1	33	100.00%	96.97%	1	C	9
NM	95	95	100.00%	68	2	70	73.68%	71.58%	8	C	5
NY	1228	1057	86.07%	187	292	479	45.32%	17.69%	24	C	) 17
PR	170	170	100.00%	91	61	152	89.41%	53.53%	10	C	) 75
RI	67	65	97.01%	30	7	37	56.92%	46.15%	2	C	2
SC	371	351	94.61%	227	97	324	92.31%	64.67%	25	C	38
SR	2	2	100.00%	2	0	2	100.00%	100.00%	0	C	0
UT	122	85	69.67%	29	5	34	40.00%	34.12%	0	C	0
VI	57	56	98.25%	37	0	37	66.07%	66.07%	0	C	0
Total	3769	3333	88.43%	1491	674	2165	64.96%	44.73%	89	11	330
Data Source: Automa	ted with Adjust	ments (Nationa	al System Rate w	vith Minor Adjust	ments by state/R						
AL	1379	704	51.05%	623	64	687	97.59%	88.49%	28	1	23
AR	675	665	98.52%	476	113	589	88.57%	71.58%	9	С	4
DC	9	9		8	0		88.89%	88.89%	1	C	) O
FL	242	221	91.32%	62	90	152	68.78%	28.05%	5	C	
GM	3	3	100.00%	3	0	3	100.00%	100.00%	0	C	, v
IA	1418	1398	98.59%	353	278	631	45.14%	25.25%	15	1	221
ID	194	119		84	15	99		70.59%	4	C	
IL	1452	1452	100.00%	205	870	1075	74.04%	14.12%	44	24	
IN	1417	1366	96.40%	683	162	845	61.86%	50.00%	26	C	
Кү	1667	1409	84.52%	1387	21	1408	99.93%	98.44%	1	C	
MO	2914	2914	100.00%	502	263	765	26.25%	17.23%	2	C	
MS	1471	1139	77.43%	557	354	911	79.98%	48.90%	5	C	) 25
NC	1085	873	80.46%	501	186	687	78.69%	57.39%	4	C	-
ОН	2464	2464	100.00%	778	1137	1915	77.72%	31.57%	13	C	
ОК	359	359	100.00%	210	110	320	89.14%	58.50%	174	C	) 12
SD	295	221	74.92%	82	27	109	49.32%	37.10%	1	1	0
ТХ	2216	1928	87.00%	1410	386	1796	93.15%	73.13%	141	C	-
Total	19260	17244	89.53%	7924	4076	12000	69.59%	45.95%	473	27	601

### Data Table 2. Clean Water Act- 2007 Annual Noncompliance Report (ANCR) Data Table

						Total					
			% NonMajors			NonMajors in		<b>Total Category I</b>			
			Reviewed by			Category I or	Total Non-	Non-Compliance		Permit Mods.	
		Non Majors	the		Additional Non-	Category II, of	Compliance Rate	Rate for	Formal	Extending	
	Non Majors	Reviewed by	state/Region in	Non-complying	complying	those with	for NonMajors	NonMajors with	Enforcement	Compliance	Schedule-
	Facility	the	PCS or ICIS-	NonMajors In	NonMajors in	Limits and	with Limits and	Limits and	Actions for	Deadline for	NonCompliant
State <sup>1</sup>		state/Region <sup>2</sup>	NPDES		Category II only	Current DMRs	Current DMRs	Current DMRs <sup>3</sup>	NonMajors	NonMajors	NonMajors
Data Source: Full Manu	al Reporting (	Data Submitte	d Manually by st	ate/Region, or Na	ational System Da	ata Was Adjuste	d Significantly by	state/Region)			
AK	99	15	15.15%	15	0	15	100.00%	100.00%	7	0	0
AZ	82	82	100.00%	29	19	48	58.54%	35.37%	0	0	1
CA	355	355	100.00%	100	21	121	34.08%	28.17%	45	10	0
CNMI	1	1	100.00%	0	0	0	0.00%	0.00%	0	0	0
GA	755	21	2.78%	17	1	18	85.71%	80.95%	1	0	0
GU	13	13	100.00%	2	2	4	30.77%	15.38%	1	1	0
KS	1035	905	87.44%	33	117	150	16.57%	3.65%	14	7	4
MN	614	614	100.00%	99	199	298	48.53%	16.12%	41	1	2
ND	97	43	44.33%	7	10	17	39.53%	16.28%	0	0	0
NJ	713	713	100.00%	9	79	88	12.34%	1.26%	9	0	0
NV	76	76	100.00%	1	3	4	5.26%	1.32%	0	0	0
OR	291	63	21.65%	1	4	5	7.94%	1.59%	3	0	0
TN	1210	293	24.21%	271	19	290	98.98%	92.49%	1	0	0
VA	966	966	100.00%	96	24	120	12.42%	9.94%	19	0	1
WA	355	355	100.00%	114	5	119	33.52%	32.11%	9	3	0
WV*	799	213	26.66%	178	43	221	103.76%	83.57%	121	0	10
WY	1792	1792	100.00%	19	0	19	1.06%	1.06%	0	0	0
OR Tribal	4	4	100.00%	0	0	0	0.00%	0.00%	0	0	0
WA Fed	43	17	39.53%	4	0	4	23.53%	23.53%	0	0	2
Total	9300	6541	70.33%	995	546	1541	23.56%	15.21%	271	22	20
Data Source: Partial Ma	nual Reportin	g (Manual Sub	mission - State	Jnable to Disting	uish Category I a	and Category II v	iolations)				
HI	31	27	87.10%	N/R	N/R	12	44.44%	N/R	0	0	0
MD	552	474	85.87%	N/R	N/R	32	6.75%	N/R	15	0	0
МІ	449	449	100.00%	N/R	N/R	219	48.78%	N/R	1	1	1
LA	1194	743	62.23%	N/R	N/R	301	40.51%	N/R	66	0	2
NN	23	23	100.00%	N/R	N/R	21	91.30%	N/R	0	0	0
PA	3968	1862	46.93%	N/R	N/R	327	17.56%	N/R	17	0	1
WI	721	721	100.00%	N/R	N/R	374	51.87%	N/R	67	4	0
AZ Tribal	13	13	100.00%	N/R	N/R	11	84.62%	N/R	0	0	0
CA Tribal	3	3	100.00%	N/R	N/R	3	100.00%	N/R	0	0	0
Total	6954	4315	62.05%	N/R	N/R	1300	30.13%	N/R	166	5	4
Did Not Report Complia											
VT	147	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Total	147	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R	N/R
Crand Totala	20202	24 4 2 2	80.000/	10440	Faac	45700	40.070/	22.400/	000	05	055
Grand Totals	39283	31433	80.02%	10410	5296	15706	49.97%	33.12%	999	65	955

\* West Virginia counts unpermitted facilities in Category 1 and Category 2 noncompliance. Unpermitted facilities are not counted in the non-major universe for the ANCR. Therefore, the percent of non-majors in non-compliance is over 100% for WV. <sup>1</sup> VI= Virgin Islands, SR = St. Regis Tribe, PR = Puerto Rico, CNMI = Commonwealth of the Northern Mariana Islands, GM = Gulf of Mexico, GU= Guam

<sup>2</sup> "Reviewed" is defined as facilities whose limits have been reviewed and compared against DMRs at least once during the reporting year, or have received some other type of compliance review by authorized regulatory authority. For states in green (automated) and blue (automated with adjustments) shading, this means that the data in the national system is producing a compliance determination for most facilities. For other states, the method of review is generally not associated with information in the national databases. For example, the state may have performed inspections, manually evaluated hard copy discharge reports, or developed compliance evaluations within a state database of discharge data.

<sup>3</sup> States with an N/R in this column indicated that they can produce a noncompliance rate, but cannot breakout the more serious Category I violations.

<sup>4</sup> For a few states the summary data provided for the non-major NPDES permittees which are one or more years behind in construction phases of the compliance schedule did match the number of non-major facilities listed in a detailed list provided by the state. These states include PR (summary count = 75, detailed count = 38), IA (summary count = 221, detailed count = 188), IN (summary count = 7, detailed count = 3). This discrepency is likely because some facilities may have been counted the same facility several times if the facility had several compliance schedules. Notes

#### Notes

A. Some states are not authorized to administer the NPDES program, thus EPA is the regulatory authority. EPA is the regulatory authority in all territories, and AK, DC, ID, MA, NM, and NH -- meaning that statistics here represent EPA activity.

B. For states that are authorized, the numbers in this table do not reflect additional EPA enforcement activity.

C. EPA does not currently require states to report discharge monitoring reports or other enforcement actions to the national database for non-major permittees. However, facility-specific noncompliance and enforcement data is widely available in ECHO for states in the green (automated) and blue (automated with adjustments) shading. These states are reporting the data voluntarily. Data from other states is not well populated in ECHO. Users interested in this additional information should contact the state.

D. Under the NPDES program, EPA does not define a penalty action that carries no administrative order as a formal enforcement action. Users searching ECHO may find more enforcement cases than indicated in this table because ECHO will show when a state takes a penalty-only action.

E. This report does not include smaller facilities that are considered "wet weather" sources, such as Concentrated Animal Feeding Operations and Stormwater permits.

F. Category I violations are more serious violations -- using equivalent methods to EPA's calculation of significant noncompliance for major facilities (examples, more than 20% over a toxics limit, more than 40% over a conventional limit, failure to submit reports, or failure to adhere to a compliance schedule). Category II violations are all other violations.

## **Overall Results**

The tables below show the arithmetic average Category I significant non-compliance (SNC) rate and total non-compliance rates. The Category I (SNC-equivalent) rate includes any facility that had at least one quarter in Category I non-compliance in the calendar year, divided by the number of standard/individual non-major permits reviewed by the state in the calendar year. The total non-compliance rate includes any facility that had at least one quarter in either Category I or II non-compliance in the calendar year, divided by the number of standard/ individual non-major permits reviewed by the state in the calendar year. Enforcement rates were determined by dividing the number of formal enforcement actions by the total number of facilities in noncompliance.

Category	Category I (SNC) Non- Compliance Rate	Total Non- Compliance Rate	Enforcement Rate for Category I Violations <sup>1</sup>	Enforcement Rate for All Violations <sup>2</sup>
Automated (Green)	44.73%	64.96%	5.97%	4.11%
Automated with Adjustments (Blue)	45.95%	69.59%	5.97%	3.94%
Full Manual Reporting (Orange)	15.21%	23.56%	27.24%	17.59%
Partial Manual Reporting (Yellow)	N/A	30.13%	N/A	12.77%

### Table 3. CY2007 ANCR Results Summary

## <u>Findings</u>

Finding 1 – Noncompliance rates at non-major facilities is high

Where the data appear to be fully populated, the noncompliance rate for more serious violations at non-majors is about 45%. Between 65% and 70% of permittees had some violation during CY2007. The Category I rate for non-majors is about twice as high as the rate for major sources. For comparison purposes, the SNC Rate for Majors in FY2007 was 21.7%. The low rate of enforcement (about 6% of serious violations received formal action) may not provide adequate deterrence to violations. EPA will be working with the states beginning in 2009 to develop proposals for strengthening the enforcement program for non-major facilities.

Finding 2 – Many states do not have an accurate count of violations that are reported.

<sup>1</sup> The enforcement rate for Category I violations was calculated by dividing the number of formal enforcement actions by the total number of Category I violations.

<sup>2</sup> The enforcement rate for all violations was calculated by dividing the number of formal enforcement actions by the total number of Category I and Category II violations.

The CWA regulations (40CFR 123.26) require the permitting authority to evaluate all compliance information for violations, and track their compliance determination findings. States that are not reporting data to EPA do not appear to have a full inventory of the violations occurring in their state. The ANCR data indicates that in 28 states (blue and green rows) with fairly complete data reporting, 45% of permittees had Category I non-compliance. States not routinely entering DMR data into EPA's system (orange and yellow rows) report a 15% Category I non-compliance rate. One possible reason these states report a much lower noncompliance rate than other states is that they may not reviewing all the DMRs that are submitted. For example, states entering all data would have the system evaluate all 12 monthly DMRs (including all pipes and pollutants). In states that perform visual or manual reviews of paper copies, the state may only review some of the submitted forms. When states are only sporadically reviewing hard copy DMR forms (without use of a computer-generated tracking system), it is likely that violations are not identified. Additionally, the enforcement rate reported on the ANCR would be inflated within these states.

Finding 3 – Some states cannot distinguish between Category I (more serious) and Category II violations.

Six states (HI, MD, MI, LA, PA, WI) only provide combined data for Category I and Category II violations, and were not able to distinguish between the two. This information is used by states to set priorities for taking enforcement. If these states begin providing DMR data to the national system, violation category distinctions will be generated automatically. One state (VT) did not report any information.

### Improved DMR Data Entry for Non-major Facilities

EPA has observed over the last four years a gradual increase in the percentage of DMRs that are being submitted into the national databases. Some states have implemented electronic reporting software that allows the information to be transmitted directly from the permittee to the state and EPA without hard copy forms and manual key-punching. Using these state efforts as a model, EPA has developed a new software tool, NetDMR, which works directly with EPA's national database – ICIS-NPDES. EPA is encouraging states to take advantage of this new technology as a way to improve violation tracking and reduce data entry burden. EPA is offering this software to the states at no cost. Information is available at www.epa.gov/netdmr.

In addition to the new NetDMR software, EPA is in the process of developing a proposed rule requiring DMR and other compliance and enforcement data to be submitted to the national data system for non-major NPDES permittees. The rule and electronic reporting tools are designed to increase the amount of information available to EPA, states, and the public.

### **Additional Data Sources**

The names and permit numbers of the facilities classified as NPDES non-majors are available online at ECHO (<u>www.epa-echo.gov/echo</u>). Violation data is provided in ECHO when the permit limits and DMRs are entered into the national database. For facilities that do not have data in ECHO, users will need to consult with the state to see what additional information may be available.

Item 7 of the ANCR report requires states to provide a list of non-major NPDES permittees that are one or more years behind in construction phases of the compliance schedule. These are listed in Appendix 1. These facilities generally need to be upgraded or modernized to allow them to meet permitted limits.

# Appendix 1

# <u>List of non-major NPDES permittees which are one or more years behind in</u> <u>construction phases of the compliance schedule</u>

To obtain information on the facilities listed below, go to <u>http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber</u>= and enter the permit number after the equal sign in the URL.

For example, if you would like to obtain additional information on SC0025259, go to <u>http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=SC0025259</u>

To obtain information on several facilities listed below, go to <u>http://www.epa-</u> <u>echo.gov/echo/search\_multiple\_ids.html</u> and copy and paste the facility ID's in the box listed.

South		_	
Carolina	Massachusetts	Iowa	Ohio
SC0025259	MA0001121	IA0041831	OH0133809
SC0030988	MA0020869	IA0069183	OH0132098
SC0025232	MA0028941	IA0065692	OH0134333
SC0039101	MA0101044	IA0024431	OH0000736
SC0021849		IA0027383	OH0129348
SC0038504	Montana	IA0041874	OH0031381
SC0025798	MT0022551	IA0057762	OH0126144
SC0042684	MT0022551	IA0061468	OH0135721
SC0003905	MT0022551	IA0021971	OH0133469
SC0027111	MT0022551	IA0028975	OH0136166
SC0039063	MT0022551	IA0028185	OH0050253
SC0041173	MT0022551	IA0020800	OH0133507
SC0043273	MT0022551	IA0065609	OH0117773
SC0022063	MT0022551	IA0042901	OH0131261
SC0041904	MT0030295	IA0027740	OH0128813
SC0002801	MT0030643	IA0020931	OH0135861
SC0021351	MT0030643	IA0070980	OH0129844
SC0047261	MT0030732	IA0062332	OH0032701
SC0024996	MTG010189	IA0049573	OH0136298
SC0035661	MTG580026	IA0069078	OH0011452
SC0031399		IA0062855	OH0119431
SC0028622	Nebraska	IA0065706	OH0136981
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