

GENERAL DESIGN
for
SNC REDEFINITION ENHANCEMENT IN
PCS

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SECTION 1 - INTRODUCTION

This General Design describes the Significant Noncompliance (SNC) Redefinition enhancement of the Environmental Protection Agency's (EPA's) Permit Compliance System (PCS). This enhancement of PCS responds to the study done by the EPA Significant Noncompliance Workgroup. This workgroup was made up of representatives from States, EPA Regions, and Headquarters. The goal of this workgroup was to reexamine the Reportable Noncompliance (RNC)/Significant Noncompliance (SNC) definition that is currently in effect. The recommendations of the workgroup were approved by Steve Herman, Assistant Administrator of the Office of Enforcement and Compliance Assurance (OECA), in the September 21, 1995 memorandum titled, "Revision of NPDES Significant Noncompliance (SNC) Criteria to Address Violations of Non-Monthly Average Limits".

1.1 PURPOSE

This document describes how the requirements of the SNC Redefinition affect the Permit Compliance System (PCS) and its users. The changes described in Steve Herman's, Sept. 21, 1995 memo are described here in terms of how the redefinition will impact the PCS software. This document assumes that the reader is familiar with both PCS and the current SNC definition. Additional information is available on the process that the workgroup used in arriving at this definition by contacting EPA Headquarters. The goal of this document is to validate that the intent of that memo is carried over to the operation of SNC processing in PCS.

1.2 BACKGROUND

Currently, a large number of NPDES facilities with serious violations are not identified as being in SNC for no other reason than their permits were written without Monthly Average Limits, and are therefore not considered for the current SNC criteria. Based on the most recent analysis, some 400 facilities that should be in SNC due to the seriousness of the violation, escape detection because the permit's limits are non-monthly averages. Violations of the Non-Monthly Average Limits facilities do pose a significant threat to the environment and public health. Toxics and other risk-based water quality based limits are being violated in a large majority of the new SNC cases. Non-toxic pollutants, such as nutrients and oxygen demanding parameters, have been documented as being among the top five causes of water quality impairment. Also over three-quarters of the non-toxic SNC violators, which will be captured by the new SNC criteria, are repeat offenders, and therefore are among the worst violators. The new SNC criteria being described in this general design enables EPA to better identify the worst violators.

1.3 SCOPE

This enhancement encompasses two of the subsystems within EPA's Permit Compliance System (PCS). The affected subsystems are Batch Update and RNC Tracking. This document presents modifications from the perspective of a PCS user. No PCS data entry, information retrieval requirements, or report formats will change as a result of this enhancement, therefore they are not addressed in this document.

OECA will use this document as a reference for verifying the requirements of this enhancement, and to distribute to State and Regional PCS users for their technical review and comment prior to programming the enhancement.

1.4 TERMS AND ABBREVIATIONS

DMR	Discharge Monitoring Report
EPA	Environmental Protection Agency
OECA	EPA's Office of Enforcement and compliance Assurance
PCS	Permit Compliance System
QNCR	Quarterly Noncompliance Report
QNCR Period	The Quarter (3 months) of the QNCR time period
RNC	Reportable Noncompliance
SNC	Significant Noncompliance

1.5 ORGANIZATION OF THIS DOCUMENT

Section 2 describes the requirements of the enhancement in paragraph form. A number of examples are included to help in describing how the new processing for the SNC Redefinition Enhancement will work. Appendix A contains a list of the types of pollutants that are considered in PCS for SNC. Appendix B contains a list of the PCS Code Value tables which will be changed as a result of the enhancement.

SECTION 2 - ENHANCEMENT REQUIREMENTS

This section describes in PCS terms the specific requirements of the enhancement to change the criteria used to calculate SNC. Section 2.1 provides the complete definition of SNC including the revisions for the detection of Non-Monthly Average violations. The sections after that describe how a Non-Monthly Average SNC violation is detected and resolved in PCS. The final section illustrates how these Non-Monthly Average SNC violations will appear on the PCS QNCR.

2.1 - Revised SNC Definition

SIGNIFICANT NONCOMPLIANCE (SNC) CRITERIA FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM VIOLATIONS

1. Effluent Violations of Monthly Average Limits

a. TRC Violations

A 40% exceedance of specific pollutant limits listed in Appendix A, Part 1 or a 20% exceedance of a specific pollutant limit from Appendix A, Part 2 at a given discharge point for any two or more months during the two consecutive quarter review period is SNC.

b. Chronic Violations

Violation of any monthly effluent limit (See Appendix A) at a given pipe for Group I and II Parameters by any amount for any four or more months during the two consecutive quarter review period is SNC.

2. Effluent Violations of Non-Monthly Average Limits¹

TRC and chronic SNC criteria are the same as for monthly average violations as described in section 1. a. and b. above. However, the following caveat also applies:

When a parameter has both a monthly average and a non-monthly average limit, a facility would only be considered in SNC for the non-monthly average limits if the monthly average is also violated to some degree (But less than SNC).

3. Other Effluent Violations

Any effluent violation that causes or has the potential to cause a water quality or human health problem is SNC.

4. Non-Effluent Violations

Any unauthorized bypass, unpermitted discharge, or pass through of pollutants which causes or has the potential to cause a water quality problem (e.g., fish kills, oil sheens) or health problems (e.g., beach closings, fishing bans, or other restrictions of beneficial uses) is SNC. In the case of POTWs implementing Approved Pretreatment Programs, failure to

Note: Non-Monthly average SNC applies to all maximum and most average (other than monthly average) statistical base codes. (See Appendix B.1).

implement or enforce those programs is SNC.

5. Permit Schedule Violations

Any failure to start construction, end construction, or attain final compliance within 90 days of the scheduled date is SNC. Also, all pretreatment schedule milestones missed by 90 days or more are SNC.

6. Permit Reporting Violations

Discharge Monitoring Reports, POTW Pretreatment Performance Reports, and the Compliance Schedule Final Report of Progress (i.e., whether final compliance has been attained) that are not submitted at all or are submitted 30 or more days late are SNC.

7. Enforcement Orders

a. Judicial Order

Any violations of a Judicial Order is SNC.

b. Administrative Order (AO)

Any violation of an effluent limit (or other water quality/health impact) established in an AO is SNC. However, when an AO limit is as stringent as an applicable permit limit, the facility is SNC only if the permit effluent SNC criteria, set out in numbers 1-3 above, are met.

Any unauthorized bypass, unpermitted discharge or pass-through of pollutants which cause or has the potential to cause a water quality problem or human health problem is SNC.

Any schedule or reporting violations listed above in sections 5 and 6 respectively are SNC.

Any violation of narrative requirements or any other violation of concern to the director is SNC.

2.2 - Basic SNC Processing Summary

Currently PCS automatically calculates when a facility is considered in Significant Non-Compliance (SNC) based on an established criteria and reviewing DMR data entered into the system and setting a facility level SNC indicator. The focus of this criteria for effluent violation has, up until now, been on Monthly Average violations. Monthly Average is defined by the use of specific PCS Statistical Base Codes that are considered as Monthly Averages. Some examples of Monthly Average limitations are "30 Day Average" and "Daily Average". The redefinition of SNC to include Non-Monthly Average Violations will have a significant impact on the RNC processing in PCS and on the QNCR. However there are a number of areas within the RNC processing of PCS that will not change. These are summarized below:

- Specific Conventional and Toxic Pollutants which are considered SNC (See Appendix A) are the same for Monthly Average and Non-Monthly Average Violations.

- Criteria of 40% exceedance for Conventional Pollutants and 20% exceedance for Toxic Pollutants will be the same for both Monthly Average and Non-Monthly Average Violations.
- When both Monthly Average SNC violations and a Non-Monthly Average SNC violations occur for the same outfall, same period, then the Monthly Average takes precedence.
- SNC criteria can be met when a violation occurs in either Quantity or Concentration for a specific measurement for the same outfall and same period.

2.3 - Detection of Non-Monthly Average SNC Violations

The following section provides an explanation and examples of how Non-Monthly Average SNC Violations will be detected. Several basic guidelines which apply are:

- The Criteria for Technical Review Criteria (TRC) of two Monthly Average Violations within a 6 month period has not changed. For a facility to be in TRC for Non-Monthly Average Violations there must be 2 violations during the 6 month period of Non-Monthly Average limitations. The PCS Statistical Base Codes which are used to define Non-Monthly Averages can be found in Appendix B.1.
- The Criteria for Chronic SNC violations of four Monthly Average Violations within a 6 month period has not changed. For a facility to be in a Chronic SNC status for Non-Monthly Average Violations there must also be 4 violations during the 6 month period of Non-Monthly Average limitations, as defined by the Statistical Base Code (See Appendix B.1).
- In addition, to reduce the incidence of isolated Maximum violations causing SNC rates to rise unrealistically, a caveat has been added. It states that if Monthly Average limitations are present for a particular parameter, then violations of the Non-Monthly Average can not be considered for either TRC or Chronic criteria unless the Monthly Average exceeds its limit by some percentage greater than zero. This also means that if the limited Monthly Average is not entered (ie: Non-Receipt violation), then the Non-Monthly Average will be evaluated. If there is no Monthly Average limit for the parameter, then the Non-Monthly Average will be evaluated.
- The precedence for the determination of SNC violations is described in the table below.

Order	Description
1	TRC Violations of Monthly Average Limits
2	Chronic Violations of Monthly Average Limits
3	TRC Violations of Non-Monthly Average Limits
4	Chronic Violations of Non-Monthly Average Limits

Examples of the detection of Non-Monthly Average TRC and Chronic SNC violations are shown below. Several examples of Monthly Average SNC is shown, but most relate to Non-Monthly Averages. Two new detection codes have been added which define TRC and Chronic violations of Non-Monthly Averages. Appendix B.2 contains a list of all of the Detection Codes used by PCS.

Examples of how PCS Detects Non-Monthly Average SNC Violations

The following table shows the examples which illustrate both the current SNC detection processing in PCS and the revised detection as a result of the new SNC definition. Note that in the following examples 'MoAv' will be used for 'Monthly Average', and 'NonMA' will be used for 'Non-Monthly Average'. See the definition of 'Non-Monthly Average' in Section 2.1.

Example	Title
TRC SNC EXAMPLES	
2.3.1	TRC w/ Monthly Average Violations (current definition)
2.3.2	TRC w/ Non-Monthly Average Violations
2.3.3	TRC w/ Non-Monthly Average Violations (due to Caveat)
2.3.4	Compliant because Monthly Average reported but not Violated (TRC)
2.3.5	Compliant because Monthly Average limited but not reported
2.3.6	Compliant because one Monthly Average and one Non-Monthly Avg. Violated
CHRONIC SNC EXAMPLES	
2.3.7	Chronic w/ Monthly Average Violations (current definition)
2.3.8	Chronic w/ Non-Monthly Average Violations
2.3.9	Compliant because Monthly Average reported but not Violated (Chronic)
2.3.10	Chronic w/ Monthly Average because Monthly Average takes precedence over Non-Monthly Average violations.

2.3.1 TRC w/ Monthly Average Violations (current definition)
 Facility Status: SNC - Effluent

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAvg				50%	50%	
NonMA						
SNC				TRC	TRC	
MoAvg and NonMA show % exceedence of violation						

2.3.2 TRC w/ Non-Monthly Average Violations
 Facility Status: SNC - Effluent (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
NonMA				50%	50%	
SNC				TRC	TRC	
MoAvg not in Permit, NonMA shows % exceedence						

2.3.3 TRC w/ Non-Monthly Average Violations (due to Caveat)
 Facility Status: SNC - Effluent (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAv				1%	1%	
NonMA				50%	50%	
SNC				TRC	TRC	
MoAvg and NonMA shows % exceedence for violation						

2.3.4 Compliant because Monthly Average reported and not violated in May
 Facility Status: Compliant

Month	January	February	March	April	May	June

EVIO	E00	E00	E00	E90	E90	E00
MoAv				1%	0%	
NonMA				50%	50%	
SNC						
MoAvg and NonMA shows % exceedence for violation						

2.3.5 Compliant because Monthly Average limited but not reported
 Facility Status: SNC - Effluent (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAv				1%	missing	
NonMA				50%	50%	
SNC				TRC	TRC	
MoAvg and NonMA shows % exceedence for violation						

2.3.6 Compliant because only One Monthly and One Non-Monthly Average Violated
 Facility Status: Compliant

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAv				1%	50%	
NonMA				50%	0%	
SNC						
MoAvg and NonMA shows % exceedence for violation						

2.3.7 Chronic w/ Monthly Average Violations (current definition)
 Facility Status: SNC - Effluent (Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E90	E90	E90	E90	E00
MoAv		1%	1%	1%	1%	
NonMA						

SNC		CHR	CHR	CHR	CHR	
MoAvg: Monthly Average % exceedence, NonMA: None Exceeded						

2.3.8 Chronic w/ Non-Monthly Average Violations
 Facility Status: SNC - Effluent (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E90	E90	E90	E90	E00
NonMA		1%	1%	1%	1%	
SNC		CHR	CHR	CHR	CHR	
MoAvg not in Permit, NonMA shows % exceedence						

2.3.9 Compliant because Monthly Average is not Violated for April
 Facility Status: Compliant

Month	January	February	March	April	May	June
EVIO	E00	E90	E90	E90	E90	E00
MoAv		1%	1%	0%	1%	
NonMA		1%	1%	1%	1%	
SNC						
MoAvg and NonMA shows % exceedence for violation						

2.3.10 Chronic w/Monthly Average taking precedence over Non-Monthly Average
 Facility Status: SNC - Effluent (Monthly Average)

Month	January	February	March	April	May	June
EVIO	E90	E90	E90	E90	E90	E90
MoAv	1%	1%	1%	1%	1%	1%
NonMA					50%	50%
SNC	CHR	CHR	CHR	CHR		
MoAvg and NonMA shows % exceedence for violation						

2.4 - Resolution of Non-Monthly Average SNC Violations

The following sections provide specific explanation and examples of how Non-Monthly Average SNC Violations will be resolved. No new codes have been added for the resolution of Non-Monthly Average violations. Appendix B.3 contains a list of all of the current Resolution Codes used by PCS.

2.4.1 - Resolution of Non-Monthly Average SNC Violations due to EA

Several applicable, basic guidelines are covered which apply:

- The resolution of TRC and Chronic SNC violations as a result of a formal Enforcement Action being entered (with accompanying schedule and Interim Limits) will automatically set the violations to a **Resolved Pending** status. The enhancement to PCS for the SNC Redefinition will treat the resolution of Non-Monthly Average TRC and Chronic SNC violations in exactly the same way.

Examples of how PCS Resolves Non-Monthly Average SNC Violations by EA

The following table shows the examples which illustrate both the current SNC resolution processing in PCS and the revised resolution as a result of the new SNC definition. The examples shown are for TRC only, however the resolution for Chronic violations occurs in exactly the same way.

Example	Title
TRC SNC EXAMPLES	
2.4.1.1	Resolution of Monthly Average by Enforcement Action (current definition)
2.4.1.2	Resolution of Non-Monthly Average Violations by Enforcement Action
2.4.1.3	Resolution of Non-Monthly Average Violations (due to Caveat) by EA

2.4.1.1 Resolution of Monthly Average Violations by EA (current definition)
 Formal Enforcement Action in June
 Facility Status: RP - Resolved Pending

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAvg				50%	50%	
NonMA						
SNC				TRC, RP	TRC,RP	

2.4.1.2 Resolution of Non-Monthly Average Violations by EA
 Formal Enforcement Action in June
 Facility Status: RP - Resolved Pending (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
NonMA				50%	50%	
SNC				TRC,RP	TRC,RP	

2.4.1.3 Resolution of Non-Monthly Average Violations (due to Caveat) by EA
 Formal Enforcement Action in June
 Facility Status: RP - Resolved Pending (Non-Monthly Average)

Month	January	February	March	April	May	June
EVIO	E00	E00	E00	E90	E90	E00
MoAv				1%	1%	
NonMA				50%	50%	
SNC				TRC,RP	TRC,RP	

Section 2.4.2 - Resolution of Non-Monthly Average by Clean Quarter

Several applicable, basic guidelines are covered which apply:

- The resolution of TRC and Chronic SNC violations as a result of a clean quarter (not in SNC) will automatically set the violations to a **Resolved** status. The

enhancement to PCS for the SNC Redefinition will treat the resolution of Non-Monthly Average TRC and Chronic SNC violations in exactly the same way.

Examples of how PCS Resolves Non-Monthly Average SNC Violations by Clear Quarter

The following table shows the examples which illustrate both the current SNC resolution processing in PCS and the revised resolution as a result of the new SNC definition. Note that in the following examples 'MoAv' will be used for 'Monthly Average', and 'NonMA' will be used for 'Non-Monthly Average'. See the definition of 'Non-Monthly Average' in Section 2.1. Only examples of TRC are shown here.

Example	Title
TRC SNC EXAMPLES	
2.4.2.1	Resolution of Monthly Average Violations (current definition) by Clean Qtr.
2.4.2.2	Resolution of Non-Monthly Average Violations by Clean Qtr.
2.4.2.3	Resolution of Non-Monthly Average Violations (due to Caveat) by Clean Qtr.

2.4.2.1 Resolution of Monthly Average Violations (current definition) by Clean Qtr.
 Facility Status: RE - Effluent, Resolved

Month	January	February	March	April	May	June
EVIO	E90	E90	E00	E00	E00	E00
MoAvg	50%	50%				
NonMA						
SNC	TRC,RE	TRC,RE				
MoAvg and NonMA show % exceedence of violation						

2.4.2.2 Resolution of Non-Monthly Average Violations by Clean Qtr.
 Facility Status: RE - Effluent (Non-Monthly Average), Resolved

Month	January	February	March	April	May	June
EVIO	E90	E90	E00	E00	E00	E00
NonMA	50%	50%				
SNC	TRC,RE	TRC,RE				
MoAvg not in Permit, NonMA shows % exceedence						

2.4.2.3 Resolution of Non-Monthly Average Violations (due to Caveat) by Clean Qtr.
 Facility Status: RE - Effluent (Non-Monthly Average), Resolved

Month	January	February	March	April	May	June
EVIO	E90	E90	E00	E00	E00	E00
MoAv	1%	1%				
NonMA	50%	50%				
SNC	TRC,RE	TRC,RE				
MoAvg and NonMA shows % exceedence for violation						

Section 2.5 - Calculation of Facility Level Compliance Status

Automatic Determination

The QNCR status that is automatically stored in the facility level QNCR Status Indicators is calculated by the RNC Process as described in the table below. This determination works basically the same as before the SNC Redefinition Enhancement. However, in order to identify facilities which have been identified as being in SNC due to Non-Monthly Average violations, a new facility level status code has been added. The chart below shows the Facility Status and codes that are automatically determined by PCS. The code the system assigns is shown in the second column and will vary depending upon the types of individual violations found for the facility. The system must also take into consideration the resolution status for those individual violations when the Facility Status is set as shown in the third column. See Appendix B.3 for a complete list of the QNCR Resolution Codes.

The number in parentheses after the status code indicates the precedence used when assigning the codes for Non-Compliant facilities. When two types of non-compliant violations are found for a facility, then the one with the highest priority is assigned for the facility.

Facility Status	Facility Level QNCR Status Code	QNCR Resolution Codes of Individual Violations (See Appendix B.3)
Non-Compliant (Automatic)	E - SNC for Effluent Violations (TRC or Chronic) Monthly Averages Only (#1) S - SNC for Compliance Schedules (#2) T - SNC for Compliance Schedule Reports (#3) D - SNC for DMR Non-Receipt at the permit level (#4) X - SNC for Effluent Violations (TRC or Chronic) Non-Monthly Average (#5) N - RNC Only (#6)	Violations containing at least one '1' or 'A'.
Non-Compliant (Manual)	E - Effluent (#1)	Manual RNC Detection codes of 'B', 'G', 'I', or 'J'.
Resolved Pending	P - Resolved Pending	Violations containing at least one '3', '4', '7', or '8' but no '1' or 'A'.
Resolved	R - Resolved	Violations containing only '2', '5', '6', or '9' and QNCR resolution dates are within the current QNCR quarter.

(Does not show on QNCR)	(Space)	Violations containing only '2', '5', '6', or '9' and QNCR resolution dates are outside the current QNCR quarter.
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Manual Determination

When the user wishes to override the automatic determination by PCS of the facilities status, then one of the codes listed below is entered into the Facility Level Manual QNCR Status fields. When a Manual QNCR Facility Level status code is entered, it will take precedence over the QNCR status code that is generated by PCS. The QNCR manual status codes and their descriptions on the QNCR are as follows:

QNCR Facility Status	Code Value	Facility Level QNCR Status Description
Compliant	C	COMPLIANT
Non-Compliant	D	NC - SNC DMR NON-RECPT: DMR non-receipt at the permit level
Non-Compliant	E	NC - SNC EFFLUENT VIOL: Effluent, Monthly Average
Non-Compliant	N	NC - RNC VIOLATNS ONLY: RNC Effluent violations only
Resolved Pending	P	RESOLVED PENDING
Resolved	R	RESOLVED
Non-Compliant	S	NC - SNC COMP SCHED VIO
Non-Compliant	T	NC - SNC COMP SCHED RPT
Non-Compliant	X	NC - SNC Effluent VIOL: Effluent, Non-Monthly Average violations only
(Not on QNCR)	(space)	(Defaults to value in Automatic QNCR status code)

Section 2.6 - Reporting on the QNCR

This section shows how the QNCR for a sample facility would show on the QNCR for TRC with Non-Monthly Averages. Note that the only difference in the appearance of the QNCR is the Section of the law that is shown in the comments section.

Example: Non-Compliant Facility in SNC from TRC criteria on Non-Monthly Average Limits

DATE: 08/02/96 REGION 02 SELECTIVE QUARTERLY NON-COMPLIANCE REPORT ** QNCR ** PAGE 1
 PERMIT COMPLIANCE SYSTEM

QNCR
 NEW JERSEY FROM: 12/01/95 TO: 02/29/96

MUNICIPALS

 NAME
 LOCATION
 NPDES NUMBER GRANT LIMIT VIOLATION ENFORCEMENT STATUS
 INSTANCE OF NONCOMPLIANCE RNC DATE ENFORCEMENT ACTION DATE STATUS DATE COMMENTS

PENNSVILLE SEWERAGE AUTHORITY NON-COMPLIANT
 PENNSVILLE
 NJ0021598 ***FINAL***

NAME	LOCATION	NPDES NUMBER	GRANT	LIMIT	VIOLATION	ENFORCEMENT ACTION	ENFORCEMENT DATE	STATUS	DATE	COMMENTS
ALL EFFLUENT ON SOLIDS, TOTAL					SUSPENDED 001A CHR 03/31/96	WARNING LETTER	(EPA) 05/17/96	NC	03/31/96	3A1 CAT II
SOLIDS, TOTAL					SUSPENDED 001A TRC 02/29/96			NC	03/31/96	3A1 CAT II
ALL EFFLUENT ON SOLIDS, TOTAL					SUSPENDED 001A TRC 01/31/96	WARNING LETTER	(EPA) 03/14/96	NC	03/31/96	3A1 CAT II
SOLIDS, TOTAL					SUSPENDED 001A TRC 11/30/95			NC	03/31/96	3A1 CAT II

***** SUMMARY SECTION *****

APPENDICES

APPENDIX A - PCS POLLUTANTS CONSIDERED FOR SNC

Part 1, SNC Conventional Pollutants (40% exceedance of limit)

Group I Pollutants - TRC=1.4

Oxygen Demand

Biochemical Oxygen Demand
Chemical Oxygen Demand
Total Oxygen Demands
Total Organic Carbon
Other

Solids

Total Suspended Solids (Residues)
Total Dissolved Solids (Residues)
Other

Nutrients

Inorganic Phosphorus Compounds
Inorganic Nitrogen Compounds
Other

Detergents and Oils

MBAS
NTA
Oil and Grease
Other detergents or algicides

Minerals

Calcium
Chloride
Fluoride
Magnesium
Sodium
Potassium
Sulfur
Sulfate
Total Alkalinity
Total Hardness
Other Minerals

Metals

Aluminum
Cobalt
Iron
Vanadium

Part 2, SNC Toxic Pollutants (20% exceedance of limit)

Group II Pollutants - TRC=1.2

Metals (all forms)

Other metals not specifically listed under Group I

Inorganic

Cyanide
Total Residual Chlorine

Organics

All Organics are Group II except those specifically listed under Group I

APPENDIX B - MODIFIED PCS CODE VALUE TABLES

Appendix B.1 - Statistical Base Codes

Indicator: A = Monthly Average
 N = Non-Monthly Average

Code	Description	Indicator
AA	ALLOWED LOAD	
AB	ANNUAL AVERAGE	N
AC	ANNUAL MAXIMUM	N
AD	ANNUAL TOTAL	
AE	ARITHMETIC MEAN	N
AF	AVERAGE	N
AG	AVERAGE BELOW DETECTABLE	N
AH	AVERAGE VALUE	N
DA	DAILY GEOMETRIC AVERAGE	A
DB	DAILY AVERAGE	A
DC	DAILY MINIMUM	
DD	DAILY MAXIMUM	N
DE	DAILY AVERAGE MINIMUM	
DF	DAILY MEDIAN	
DG	DISCHARGE PER DAY AVERAGE	N
DH	DISCHARGE PER DAY GEOMET.	N
DI	DISCHARGE PER DAY MAXIMUM	N
DJ	DISCHARGE PER DAY MINIMUM	
DK	DISCHARGE PER DAY TOTAL	
DL	DAILY GEOMETRIC MINIMUM	
DM	DAILY GEOMETRIC	N
GA	GEOMETRIC MEAN	N
HA	HIGH 7 DAY AVERAGE	N
IA	INSTANTANEOUS MAXIMUM	N
IB	INSTANTANEOUS MINIMUM	
IC	INSTANTANEOUS MIN. GEOM.	
LA	LOGARITHMIC MEAN	N
LB	LOGARITHMIC MONTHLY MEDIA	
MA	MAXIMUM BDL	N
MB	MAXIMUM	N
MC	MEAN	N
MD	MEDIAN	
ME	MINIMUM	
MF	MINIMUM PERCENT REMOVAL	
MG	MINIMUM WEEKLY AVERAGE	N
MH	MINIMUM 7 DAY AVERAGE	N
MI	MINIMUM 7 DAY GEO. AVG.	N
MJ	MONTHLY AVERAGE MINIMUM	N
MK	MONTHLY AVERAGE	A
ML	MONTHLY GEOMETRIC	A
MM	MONTHLY GEOMETRIC MEAN	A
MN	MONTHLY MAXIMUM	N
MO	MONTHLY MINIMUM	

MP	MONTHLY TOTAL	A
MQ	MAXIMUM DAILY AVERAGE	N
MR	MAXIMUM HOURLY RATE	N
MS	MAXIMUM WEEKLY AVERAGE	N
MT	MAXIMUM 7 DAY AVERAGE	N
MU	MAXIMUM 7 DAY GEOMETRIC	N
MV	MAXIMUM 7 DAY GEO. AVG.	N
MW	MAXIMUM SINGLE SAMPLE	N
MX	MONTHLY GEOMETRIC MAXIMUM	N
MY	MONTHLY LOADING	
MZ	MINIMUM VALUE	
MO	MAXIMUM VALUE	N
MI	MAXIMUM 30 DAY AVERAGE	N
NA	NON-SPECIFIC AVERAGE	N
NB	NON-SPECIFIC MAXIMUM	N
QA	QUARTERLY AVERAGE	N
QB	QUARTERLY MAXIMUM	N
RA	ROLLING AVERAGE	N
SA	SINGLE SAMPLE	
SB	SINGLE MV CONC. SAMPLE	
SC	SEMI AVERAGE	N
SD	SINGLE SAMPLE GEOMETRIC	
SE	SINGLE READINGS	
SF	SUCCESSFULL READINGS	
TA	TOTAL AMOUNT APPLIED	
WA	WEEKLY AVERAGE	N
WB	WEEKLY GEOMETRIC	N
WC	WEEKLY MAXIMUM	N
WD	WEEKLY MINIMUM	
XA	>BACKGROUND	
YA	YEAR-TO-DATE TOTAL	
1A	1 DAY GEOMETRIC	A
1B	10% OVER 60 DAYS	
1C	12 DAY AVERAGE	N
1D	12 MONTH AVERAGE	N
1E	12 MONTH DAILY WATER FLOW	
1F	120 DAY AVERAGE	N
1G	180 DAY ARITHMETIC MEAN	N
1H	1 DAY AVERAGE	N
2A	20% OVER 30 DAYS	
3A	30 DAY GEOMETRIC MEAN	N
3B	30 DAY ARITHMETIC	A
3C	30 DAY AVERAGE	A
3D	30 DAY GEOMETRIC	A
3E	30 DAY MAXIMUM	N
3F	30 DAY ARITHMETIC MEAN	N
3H	30 DAY AVERAGE GEOMETRIC	N
4A	4 DAY AVERAGE	N
4B	4 DAY MAXIMUM	N
4C	48 HOUR MAXIMUM	N
4D	4 HOUR AVERAGE	N
5A	50TH PERCENTILE	

6A	6 MONTH MEDIAN	
6B	6 HOUR MEAN	N
6C	6 HOUR GEOMETRIC MEAN	N
6D	6 MONTH AVERAGE	N
6E	6 HOUR AVERAGE	N
6F	6 HOUR GEOMETRIC	N
7A	7 DAY AVERAGE	N
7B	7 DAY GEOMETRIC	N
7C	7 DAY MEDIAN	
7D	7 DAY MINIMUM	
7E	7 DAY MAXIMUM	N
7F	7 DAY ARITHMETIC	N
7G	7 DAY ARITHMETIC MEAN	N
7H	75TH PERCENTILE	
8A	80TH PERCENTILE	
9A	90TH PERCENTILE	
9B	90 DAY AVERAGE	N
9C	90 DAY, 90 PERCENT	
9D	96 HOUR	N

Appendix B.2 - SNC Detection Codes

Code	Definition on QNCR	Setting Type	QNCR Category
A	ENF-ADMINISTRATIVE ORDER: Measurement exceeded administrative monthly average limit set by a formal enforcement action.	Automatic	I(A)
B	DIS-MANUAL 2A4 - PASS-THROUGH: Discretionary or manual entry of a violation of a pass-through of pollutants.	Manual	II(A)(4)
C	CHR - CHRONIC VIOLATION: Chronic violation of four or more monthly average violations occurring within a six month time frame.	Automatic	I(C)
D	DIS - MANUAL OTHER: Discretionary or manual entry of violation of condition in enforcement orders except compliance schedules and reports.	Manual	I(A)
E	DIS - MANUAL 2F - PRMT NARRATIVE: Discretionary or manual entry of a permit narrative violation.	Manual	II(F)
F	DIS - MANUAL 2G - VIOLATION OF CONCERN: Discretionary or manual entry of a permit violation of concern to the Director or Regional Administrator.	Manual	II(G)
G	DIS - MANUAL 2A1 - EFFLUENT VIOL: Discretionary or manual entry of Category II permit limit violation.	Manual	II(A)(1)
H	CHR - CHRONIC VIOLATION: Chronic violation of four or more Non-monthly average violations occurring within a six month time frame.	Automatic	III(A)(1)
I	DIS - MANUAL 2A2 - UNAUTH BYPASS: Discretionary or manual entry of violations or an unauthorized by-pass.	Manual	II(A)(2)
J	DIS - MANUAL 2A3 - UNAUTH DISCH: Discretionary or manual entry of violations of an unpermitted discharge.	Manual	II(A)(3)
K	RPT - NONRECEIPT OF DMR/CS RPT-NON MON AVG: Reporting violation was 30 days overdue or DMR was incomplete.	Automatic	III(A)1

N	RPT - NONRECEIPT OF DMR/CS RPT: Reporting violation was 30 days overdue or DMR was incomplete.	Automatic	I(D)
P	ENF-ADMINISTRATIVE ORDER-NON MON AVG: Measurement exceeded administrative non-monthly average limit set by a formal enforcement action.	Automatic	III(A)1
Q	DIS - MANUAL 2B - PRETREATMENT: Discretionary of manual entry of permit pretreatment.	Manual	II(B)
S	SCH - COMPLIANCE SCHEDULE VIOL: Compliance Schedule violations were 90 days overdue.	Automatic	I(B) for Cat. I, or II(C) for Cat. II
R	TRC - TRC LIMITATIONS EXCEEDED: TRC limitations were exceeded for two violations of Non-monthly averages within a six-month time frame or chronic violations.	Automatic	III(A)(1)
T	TRC - TRC LIMITATIONS EXCEEDED: TRC limitations were exceeded for two violations of monthly averages within a six-month time frame or chronic violations.	Automatic	I(C)
U	EFF - OTHER VIOLATION WITH TRC-NON MON AVG: Effluent violations occurring within a six month time frame associated with Non-Monthly Avg. TRC RNC.	Automatic	III(A)1
V	EFF - OTHER VIOLATION WITH TRC: Effluent violations occurring within a six month time frame associated with TRC RNC.	Automatic	I(C)
W	DIS - MANUAL 2E - DEFICIENT RPT: Discretionary or manual entry of deficient report violations.	Manual	II(E)
X	EFF - MANUAL OTHER VIOL W/ TRC: Discretionary or manual entry of effluent violations occurring within a six-month time frame associated with TRC RNC.	Manual	I(C)
Y	TRC - MANUAL TRC: Discretionary or manual entry of TRC limitations that were exceeded for two violations of monthly averages within a six month time frame or chronic violations exceeding TRC limitations.	Manual	I(C)

Z	CHR - MANUAL CHRONIC: Discretionary or manual entry of four or more violations occurring within a six month time frame.	Manual	I(C)
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Appendix B.3 - SNC Resolution Codes

Code	Resolution Code	Setting Type
Space	No RNC	Automatic
1	NC - UNRESOLVED RNC:	Automatic
2	RE - BACK INTO COMPLIANCE	Automatic
3	RP - DUE TO FORMAL EA	Automatic
4	RP - IN COMPLIANCE LAST QTR	Automatic
5	RE - RESOLVED RP BY EA W/ CL	Automatic
6	RP - MANUAL RES BY EA W/ CL	Manual
7	RP - MANUAL RP-IN COMP W/ ADM LMT	Manual
8	RP - MANUAL DUE TO FORMAL EA	Manual
9	RE - MANUAL BACK INTO COML	Manual
A	NC - MANUAL UNRESOLVED RNC	Manual
B	RE - MANUAL BY EPA ACTION	Manual
W	NC - WAITING RNC RESOLUTION	Automatic