

April 11, 2006

MEMORANDUM

SUBJECT: Revisions to the Recently Issued Final Guidance on the Reporting of CWA NPDES Wet Weather and CAFO Inspections to PCS and Changes to the 3560-3 Water Compliance Inspection Report Form

FROM: David Hindin, Director /s/
Enforcement Targeting and Data Division,
Office of Compliance

TO: Regional Enforcement Division Directors
Regional Water Division Directors
Regional NPDES Enforcement Branch Chiefs

The purpose of this memorandum is to advise you that EPA has made several changes to the Inspection Type codes that were listed in the January 2006 final guidance concerning reporting of Clean Water Act (CWA) National Pollutant Discharge Elimination System (NPDES) wet weather inspection data to the Permit Compliance (data) System (PCS). These changes were necessitated by problems that were brought to our attention by several PCS users, which we were not able to detect during our pre-release testing of the code changes. EPA has also made several minor changes to Form 3560-3 "Water Compliance Inspection Report," (an attachment to the guidance) which are discussed below.

Reason for Changes to Inspection Type (TYPI) Codes

Since the final guidance was issued in January, several PCS users in states that enter codes into their state data bases in support of the NPDES program identified translation problems with three characters that were selected to replace old wet weather inspection type codes. The problem characters and the inspection types that they represent are "^" (CAFO-Sampling), "[" (Stormwater-(Construction)-Sampling), and "]" (Stormwater-(Construction)-Non-Sampling). These states advised EPA that when their staff attempt to convert their data into a format that will be accepted by PCS via batch transaction processing, the inspection types assigned these characters translate into the wrong characters, resulting in erroneous data being transmitted on batch transactions to be updated into PCS.

Since this character translation problem occurs outside of the PCS operating environment and is not controllable by EPA, EPA has elected to change the three codes to use symbols that do not get converted incorrectly by the batch reporting process.

Changes to Codes

In the tables below, the column header, “Jan. 2006 TYPI code,” refers to the recently issued inspection type code values for particular inspections as they appeared in the January 2006 final guidance. The column header, “Replacement TYPI code,” refers to the new code that EPA has selected to replace the codes that were erroneously converting. The codes in the first table below represent the changes that we have made to address this problem.

Inspection Type Name	Counting Category	Jan 2006 TYPI code	Replacement TYPI code
CAFO Sampling	Sampling	^	\
Stormwater (Construction) Non-Sampling	Non-Sampling]	}
Stormwater (Construction) Sampling	Sampling	[{

Table 1 below is a full list of the 13 wet weather inspection types that were added by the January guidance with the revised codes indicated in bold type. All other inspection types remain the same, as they are displayed in this table. A revised page 6 to the January final guidance with a corrected Table 1 is attached to this memorandum and should replace the original page 6.

Table 1			
Inspection Type Name - Added	Counting Category	PCS Inspection Type Code Jan. 2006	PCS Inspection Type Code Jan. 2006 w/Replacements
CSO Sampling	Sampling	#	#
CSO Non-Sampling	Non-Sampling	\$	\$
SSO Sampling	Sampling	+	+
SSO Non-Sampling	Non-Sampling	&	&
CAFO Sampling	Sampling	^	\
CAFO Non-Sampling	Non-Sampling	=	=
Stormwater (Construction) Sampling	Sampling	[{
Stormwater (Construction) Non-Sampling	Non-Sampling]	}
Stormwater (Non-Construction) Sampling	Sampling	:	:

Table 1			
Inspection Type Name - Added	Counting Category	PCS Inspection Type Code Jan. 2006	PCS Inspection Type Code Jan. 2006 w/Replacements
Stormwater (Non-Construction) Non-Sampling	Non-Sampling	~	~
Stormwater (MS4) Sampling	Sampling	<	<
Stormwater (MS4) Non-Sampling	Non-Sampling	-	-
Stormwater (MS4) Audit	Audit	>	>

In order to correct any errors in reporting of inspections affected by the January 2006 codes, any inspections entered with these codes since the guidance was issued in January will have to be changed to the replacement codes. Unless advised otherwise by the regions or states, EPA Headquarters will make these changes. If you have any questions about this process, please contact Jeffrey Clark at (202) 564-2494, or via email: Clark.JeffreyF@epa.gov.

Changes to Form 3560-3

As indicated above, EPA is also making several changes to the NPDES Water Compliance Inspection Report, Form 3560-3, in response to suggestions from several users. These changes include:

1. Changes have been made to reflect the replacement TYPI codes discussed above.
2. A signature block for inspectors, which was inadvertently deleted from the revised form, has been added.
3. A line, which states, "EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete," has been added at the bottom of the form.

The revised Form 3560-3 is a WordPerfect document and is attached. EPA is not able to provide the form in Word format at this time. Users should save the form to their computers and print them as necessary.

Distribution and Contacts

Since the changes discussed herein will be of interest to users of the original guidance, we again request that the Regional Enforcement Coordinators distribute this memorandum to the state contacts and all other state personnel who received the original guidance.

If you have any questions about this final guidance, please contact Daniel Palmer, Chief, Reporting and Analysis Section, at (202) 564-5034, or via email at Palmer.Daniel@epa.gov, or Jeffrey F. Clark at (202) 564-2494, or via email at Clark.JeffreyF@epa.gov.

Attachment

cc: Regional Enforcement Coordinators
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