

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, EPA retains oversight and can initiate enforcement actions. 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 self-monitoring 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.¹

¹ 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:

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

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 ²		
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.

**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.*

² 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 non-compliance 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 major 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 non-major 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 interim 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

July 2, 2009

State ¹	Non Majors Facility Universe	Non Majors Reviewed by the state/Region ²	% NonMajors Reviewed by the state/Region in PCS or ICIS-NPDES	Non-complying NonMajors In Category I	Additional Non-complying NonMajors in Category II only	Total NonMajors in Category I or Category II, of those with Limits and Current DMRs	Total Non-Compliance Rate for NonMajors with Limits and Current DMRs	Total Category I Non-Compliance Rate for NonMajors with Limits and Current DMRs ³	Formal Enforcement Actions for NonMajors	Permit Mods. Extending Compliance Deadline for NonMajors	Schedule-NonCompliant NonMajors ⁴
Data Source: Automated (National Database with No Changes by state/Region)											
CO	247	209	84.62%	133	66	199	95.22%	63.64%	12	11	153
CT	79	76	96.20%	11	6	17	22.37%	14.47%	1	0	0
DE	35	30	85.71%	1	15	16	53.33%	3.33%	0	0	0
MA	157	136	86.62%	119	3	122	89.71%	87.50%	1	0	4
ME	272	192	70.59%	117	67	184	95.83%	60.94%	1	0	11
MT	189	176	93.12%	104	13	117	66.48%	59.09%	1	0	14
NE	632	600	94.94%	303	39	342	57.00%	50.50%	3	0	2
NH	46	33	71.74%	32	1	33	100.00%	96.97%	1	0	9
NM	95	95	100.00%	68	2	70	73.68%	71.58%	8	0	5
NY	1228	1057	86.07%	187	292	479	45.32%	17.69%	24	0	17
PR	170	170	100.00%	91	61	152	89.41%	53.53%	10	0	75
RI	67	65	97.01%	30	7	37	56.92%	46.15%	2	0	2
SC	371	351	94.61%	227	97	324	92.31%	64.67%	25	0	38
SR	2	2	100.00%	2	0	2	100.00%	100.00%	0	0	0
UT	122	85	69.67%	29	5	34	40.00%	34.12%	0	0	0
VI	57	56	98.25%	37	0	37	66.07%	66.07%	0	0	0
Total	3769	3333	88.43%	1491	674	2165	64.96%	44.73%	89	11	330
Data Source: Automated with Adjustments (National System Rate with Minor Adjustments by state/Region)											
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	0	4
DC	9	9	100.00%	8	0	8	88.89%	88.89%	1	0	0
FL	242	221	91.32%	62	90	152	68.78%	28.05%	5	0	1
GM	3	3	100.00%	3	0	3	100.00%	100.00%	0	0	0
IA	1418	1398	98.59%	353	278	631	45.14%	25.25%	15	1	221
ID	194	119	61.34%	84	15	99	83.19%	70.59%	4	0	0
IL	1452	1452	100.00%	205	870	1075	74.04%	14.12%	44	24	14
IN	1417	1366	96.40%	683	162	845	61.86%	50.00%	26	0	7
KY	1667	1409	84.52%	1387	21	1408	99.93%	98.44%	1	0	34
MO	2914	2914	100.00%	502	263	765	26.25%	17.23%	2	0	27
MS	1471	1139	77.43%	557	354	911	79.98%	48.90%	5	0	25
NC	1085	873	80.46%	501	186	687	78.69%	57.39%	4	0	8
OH	2464	2464	100.00%	778	1137	1915	77.72%	31.57%	13	0	223
OK	359	359	100.00%	210	110	320	89.14%	58.50%	174	0	12
SD	295	221	74.92%	82	27	109	49.32%	37.10%	1	1	0
TX	2216	1928	87.00%	1410	386	1796	93.15%	73.13%	141	0	2
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

July 2, 2009

State ¹	Non Majors Facility Universe	Non Majors Reviewed by the state/Region ²	% NonMajors Reviewed by the state/Region in PCS or ICIS-NPDES	Non-complying NonMajors In Category I	Additional Non-complying NonMajors in Category II only	Total NonMajors in Category I or Category II, of those with Limits and Current DMRs	Total Non-Compliance Rate for NonMajors with Limits and Current DMRs	Total Category I Non-Compliance Rate for NonMajors with Limits and Current DMRs ³	Formal Enforcement Actions for NonMajors	Permit Mods. Extending Compliance Deadline for NonMajors	Schedule-NonCompliant NonMajors
Data Source: Full Manual Reporting (Data Submitted Manually by state/Region, or National System Data Was Adjusted 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 Manual Reporting (Manual Submission - State Unable to Distinguish Category I and Category II violations)											
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
MI	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 Compliance Information to EPA											
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
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.

¹ VI= Virgin Islands, SR = St. Regis Tribe, PR = Puerto Rico, CNMI = Commonwealth of the Northern Mariana Islands, GM = Gulf of Mexico, GU= Guam

² "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.

³ 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.

⁴ 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 discrepancy is likely because some facilities may have been counted the same facility several times if the facility had several compliance schedules.

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 non-compliance.

Table 3. CY2007 ANCR Results Summary

Category	Category I (SNC) Non-Compliance Rate	Total Non-Compliance Rate	Enforcement Rate for Category I Violations¹	Enforcement Rate for All Violations²
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%

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.

1 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.

2 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.

Additional Data Sources

The names and permit numbers of the facilities classified as NPDES non-majors are available online at ECHO (www.epa-echo.gov/echo). 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

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

To obtain information on the facilities listed below, go to <http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=> 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 <http://www.epa-echo.gov/cgi-bin/get1cReport.cgi?tool=echo&IDNumber=SC0025259>

To obtain information on several facilities listed below, go to http://www.epa-echo.gov/echo/search_multiple_ids.html 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
SC0033685	NE0111724	IA0068381	OH0136832
SC0024856	NE0132641	IA0075671	OH0137022
SC0002071		IA0027421	OH0028690
SC0025844	New Hampshire	IA0025364	OH0021733
SC0032859	NH0101231	IA0067725	OH0026565
SC0020052	NH0101231	IA0021962	OH0030902
SC0026727	NH0101231	IA0021075	OH0027294

SC0026751	NH0101249	IA0047988	OH0020214
SC0026743	NHR05A615	IA0024562	OH0122068
SC0031208	NHR05A615	IA0027987	OH0119300
SC0028673	NHR05A615	IA0035041	OH0134783
SC0038113	NHR05A615	IA0044032	OH0059005
SC0039217	NHR05A615	IA0062375	OH0045446
SC0027189		IA0027227	OH0114103
SC0026883	New York	IA0075914	OH0033952
SC0025194	NY0000001	IA0025925	OH0134724
	NY0000001	IA0041891	OH0036030
North Carolina	NY0000001	IA0064742	OH0129461
NC0085928	NY0022578	IA0022284	OH0114073
NC0069761	NY0023493	IA0048321	OH0129178
NC0048089	NY0026531	IA0061590	OH0053163
NC0054992	NY0068292	IA0063991	OH0011193
NC0003395	NY0075035	IA0068985	OH0129038
NC0069612	NY0075868	IA0041254	OH0128295
NC0023337	NY0098795	IA0072532	OH0103365
NC0081850	NY0098795	IA0068918	OH0052418
	NY0104850	IA0068314	OH0118397
Missouri	NY0110167	IA0021024	OH0053961
MS0034860	NY0140660	IA0023361	OH0102229
MS0022829	NY0148270	IA0068586	OH0136409
MS0031577	NY0192031	IA0025984	OH0135844
MS0031585	NY0192031	IA0056707	OH0133949
MS0033596	NY0201278	IA0074284	OH0136841
MS0000795	NY0205371	IA0068306	OH0131423
MS0043494	NY0207519	IA0056910	OH0135828
MS0040924	NY0209597	IA0027871	OH0059323
MS0044237	NY0209597	IA0063983	OH0132853
MS0033057	NY0209597	IA0062910	OH0128732
MS0026964	NY0226327	IA0063827	OH0119369
MS0024678	NY0228133	IA0058572	OH0134317
MS0039250	NY0260151	IA0047937	OH0052132
MS0052949	NY0261343	IA0059463	OH0133531
MS0025151	NYA000281	IA0022314	OH0132888
MS0057649	NYR10F041	IA0036552	OH0136697
MS0046906	NYR10F041	IA0071374	OH0091740
MS0047473	NYR10H246	IA0030511	OH0132594
MS0052523		IA0048330	OH0139301
MS0044962	Pennsylvania	IA0026654	OH0078981
MS0001520	PA0023540	IA0023507	OH0133019
MS0044709		IA0041947	OH0083984
MS0035955	Puerto Rico	IA0041955	OH0040657
MS0002852	PR0001341	IA0073890	OH0120553
MS0051527	PR0022462	IA0059587	OH0134112
	PR0022471	IA0059153	OH0115134
Kentucky	PR0022489	IA0042943	OH0102903
KY0082970	PR0022519	IA0021041	OH0136182

KY0101851	PR0022560	IA0027391	OH0079278
KY0090719	PR0022586	IA0073768	OH0133248
KY0035467	PR0022799	IA0032506	OH0131661
KY0021571	PR0022837	IA0041904	OH0134236
KY0023868	PR0022861	IA0036064	OH0076350
KY0074977	PR0022918	IA0057134	OH0126021
KY0020958	PR0022918	IA0070751	OH0133191
KY0056561	PR0023779	IA0057045	OH0131296
KY0021229	PR0023779	IA0071242	OH0050334
KY0040584	PR0023981	IA0058530	OH0046817
KY0026913	PR0024104	IA0057827	OH0133698
KY0033413	PR0024112	IA0037036	OH0131300
KY0086932	PR0024155	IA0037036	OH0134554
KY0073679	PR0024163	IA0033073	OH0036072
KY0083275	PR0024686	IA0033031	OH0125113
KY0001660	PR0025101	IA0061352	OH0136123
KY0020001	PR0025194	IA0033707	OH0129089
KY0086916	PR0025470	IA0033308	OH0127876
KY0024881	PR0025518	IA0036030	OH0129526
KY0026352	PR0025704	IA0032514	OH0133744
KY0034444	PR0025721	IA0047945	OH0136212
KY0025925	PR0025755	IA0076805	OH0117340
KY0028355	PR0025852	IA0071161	OH0129097
KY0022144	PR0025895	IA0071072	OH0123692
KY0092801	PR0025950	IA0047996	OH0040584
KY0026131	PR0026018	IA0036170	OH0124320
KY0020702	PR0026026	IA0033332	OH0045179
KY0020982	PR0026042	IA0068632	OH0133175
KY0039756	PR0026077	IA0054178	OH0131971
KY0028118	PR0026182	IA0042757	OH0043991
KY0023183	PR0026271	IA0036129	OH0048763
KY0028347	PR0026425	IA0033774	OH0124141
KY0025852	PR0026450	IA0068659	OH0138126
		IA0033103	OH0123188
Florida	Rhoda Island	IA0033120	OH0101664
FL0043443	RI0020176	IA0069159	OH0122467
	RI0021962	IA0032549	OH0133094
Alabama		IA0061891	OH0012661
AL0059358	Illinois	IA0073237	OH0137090
AL0021237	IL0067555	IA0071048	OH0095435
AL0024341	IL0022896	IA0064432	OH0122157
AL0024678	IL0004235	IA0065595	OH0112470
AL0021458	IL0047261	IA0033880	OH0051551
AL0064955	IL0045837	IA0067903	OH0121002
AL0071285	IL0052493	IA0033367	OH0096466
AL0023493	IL0023523	IA0067849	OH0136387
AL0052914	IL0048003	IA0062006	OH0120910
AL0021334	IL0024678	IA0040274	OH0138312
AL0058343	IL0032042	IA0032719	OH0137031
AL0020699	IL0026093	IA0030848	OH0136972

AL0049387	IL0047520	IA0056952	OH0130702
AL0023809	IL0073717	IA0057037	OH0101117
AL0042765	IL0020672	IA0042757	OH0134082
AL0020915		IA0074560	OH0128309
AL0053716	West Virginia	IA0023469	OH0137103
AL0060887	WV0077038	IA0023574	OH0002500
AL0059234	WV0075752	IA0023574	OH0136042
AL0053066	WV0024490	IA0070327	OH0136301
AL0022349	WV0105791	IA0074781	OH0138339
AL0046761	WV0022080	IA0028215	OH0053279
AL0024171	WV0024945	IA0036871	OH0033987
	WV0084301	IA0028215	OH0072541
Michigan	WV0040843	IA0023485	OH0129861
MI0028517	WV0105732	IA0027235	OH0136816
	WV0110710	IA0041262	OH0133574
Kansas		IA0067741	OH0132101
KS0031097	Virginia	IA0036145	OH0136735
KS0046345	VA0088838	IA0057100	OH0129518
KS0047261		IA0062545	OH0106283
KS0087874	Washington Tribal	IA0030686	OH0118176
	WA0026123	IA0035921	OH0103217
Missouri	WA0050229	IA0067431	OH0136964
MO0122157		IA0058190	OH0134180
MO0113328	Indiana	IA0065480	OH0134503
MO0125458	IN0020087	IA0027235	OH0046973
MO0031674	IN0043753	IA0059153	OH0132721
MO0056553	IN0021229	IA0043541	OH0124389
MO0101541		IA0036617	OH0133884
MO0095141		IA0078018	OH0092649
MO0100374		IA0078255	OH0137391
MO0101672		IA0024431	OH0045497
MO0099228		IA0078361	OH0007641
MO0103799		IA0074659	OH0136671
MO0115363		IA0077984	OH0092860
MO0124745		IA0036129	OH0137308
MO0090051		IA0027413	OH0003514
MO0116491		IA0077984	OH0003506
MO0116351		IA0023337	OH0051390
MO0110019		IA0042919	OH0138053
MO0119628		IA0042871	OH0101583
MO0121231		IA0068993	OH0133388
MO0085618		IA0071820	OH0132039
MO0106577		IA0062472	OH0129950
MO0130311		IA0076121	OH0084000
MO0037257		IA0062332	OH0021610
MO0113484		IA0072427	OH0101206
MO0109401		IA0042811	OH0133787
MO0088561		IA0033723	OH0132829
MO0098043		IA0041262	OH0135810
		IA0056910	OH0021661

Minnesota
MN0022811
MN0050211

Arkansas
AR0020117
AR0041424
AR0046060
AR0039896

Louisiana
LA0049271
LA0040185

New Mexico
NM0023485
NM0028479
NM0029149
NM0028614
NM0024848

IA0032824	OH0030007
IA0065960	OH0023957
IA0057827	OH0047783
IA0024503	OH0021032
IA0026018	OH0024295
IA0036129	OH0020974
IA0035068	OH0095141
IA0021032	OH0025127
IA0072982	OH0021300
IA0062006	OH0020141
	OH0020869
Oklahoma	OH0025771
OK0028177	OH0041131
OK0027014	OH0026051
OK0045365	OH0042081
OK0035297	OH0022641
OK0034550	OH0020168
OK0045098	OH0021849
OK0031186	OH0020613
OK0034266	OH0023531
OK0037028	OH0020737
OK0020737	OH0026735
OK0028258	OH0020273
OK0028380	OH0020338
	OH0027065
Texas	OH0027219
TX0000612	OH0047902
TX0002887	OH0020729
	OH0027383
Arizona	OH0027405
AZ0025054	OH0021971
	OH0023566
	OH0055093
	OH0054321
	OH0030384
	OH0087904
	OH0133205
	OH0139084
	OH0126578
	OH0124907
	OH0124184
	OH0046451
	OH0136913
	OH0136328