1.0 ICIS-FE&C Data Elements Included in IDEA Data Download

The Integrated Data for Enforcement Analysis (IDEA) system incorporates Federal enforcement and compliance (FE&C) data from the Integrated Compliance Information System (ICIS), used to track federal enforcement cases. ICIS contains information on federal administrative and federal judicial cases under the following environmental statutes: the Clean Air Act (CAA), the Clean Water Act (CWA), the Resource Conservation and Recovery Act (RCRA), the Emergency Planning and Community Right-to-Know Act (EPCRA) Section 313, the Toxic Substances Control Act (TSCA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), the Safe Drinking Water Act (SDWA), and the Marine Protection, Research, and Sanctuaries Act (MPRSA). ICIS may contain duplicates of actions and penalties shown in the program databases (AFS, PCS, and RCRAInfo). Additionally, because ICIS-FE&C is the enforcement component of ICIS-NPDES, State cases are present for those States who have migrated their CWA NPDES data from PCS to ICIS-NPDES.

ICIS Description

ICIS is a case activity tracking and management system for civil, judicial, and administrative federal EPA enforcement cases. Case information is supplied and updated by EPA's Offices of Regional Counsel and Office of Civil Enforcement case attorneys. The basic structure of an ICIS FE&C record focuses on an enforcement case. It is assigned a case number and a case name which identifies the defendant (or principal defendant if more than one is named in the complaint). For administrative actions, the record includes the nature of the violation, statute(s) involved, and milestone dates (e.g., the date the order was issued). Judicial actions contain information similar to that for administrative actions, but include more detailed milestone dates. IDEA contains a subset of the ICIS data which includes:

- General Case Information—Case Number, Case Name, etc.
- Violation Information—Law/Section, Violation Date, etc.
- Defendant Name(s)
- Milestone Dates-Referred to DOJ, Filed, Concluded, etc.
- Penalty Amounts Fines, SEPs, etc

ICIS tracks enforcement actions taken against companies or individuals. Therefore, the ICIS case name may not exactly correspond to the facility name for ICIS records linked via FRS to facility records from other program office data systems.

Scope of ICIS Data Download

The Integrated Compliance Information System (ICIS) tracks all formal administrative and judicial enforcement actions taken by the U.S. EPA and is used as the system of record to provide official enforcement data. Additionally, state formal CWA administrative and judicial enforcement actions for those States using ICIS-NPDES are also tracked by ICIS FE&C. The ICIS download includes data on issued administrative orders and filed judicial cases under EPA and State enabling statutory authorities. The majority of EPA enforcement actions are initiated and tracked by the EPA regional offices. The cases are updated on a regular basis to provide new information.

Data in the download files are organized around two concepts: the enforcement case and a resulting settlement(s) (enforcement conclusion). Enforcement case data describe the enforcement action from initiation through to its conclusion. If multiple defendants, facilities, and/or violations are

cited in the case, then a single case may result in multiple settlements. These case conclusions describe what has been ordered and/or agreed upon to be performed to address violations identified by the case complaint.

Two key identifiers are used. The primary key is the Activity Identifier (ACTVID), which is an internal number having no other significance than to relate case-level data within and across the files. The Enforcement Conclusion Identifier (ENFCID) is an internal number having no other significance than to relate settlement-level data within and across the data files. Data which repeat within a file are indicated file structure tables.

The included case level files are:

- Case Identifiers (ICI01.TXT)
- Violation(s) (ICI02.TXT)
- Penalties/Relief Values (ICI03.TXT)
- Case Summary (ICI04.TXT)
- Laws Sections (ICI05.TXT)
- Facilities in Case (ICI06.TXT)
- Defendants (ICI07.TXT)
- Milestone Activities/Dates (ICI08.TXT)
- Pollutants Cited (ICI09.TXT)

and enforcement conclusion level files:

- Case Conclusion (ICI10.TXT)
- Pollutant Reductions (ICI11.TXT)
- Complying Actions (ICI12.TXT)
- Enforcement Conclusion Facilities (ICI13.TXT)
- SEP Description (ICI14.TXT)

Data can be verified against an ECHO Case Report by supplying the ENFOCNU value in the "EPA Case No." box on the ECHO Search Enforcement Data (EPA Cases) query screen (http://www.epa-echo.gov/echo/compliance_report_icis.html).

Note: in 1996 EPA implemented an effort to improve reporting and tracking of settlement data in the predecessor database to ICIS (EPA Civil DOCKET). While that effort did include an attempt to provide additional detail on older closed cases, those cases entered prior to 1996 may not provide much settlement detail.

Maintaining the case-level versus case conclusion-level model, penalties are reported in two data files: PENALTIES/RELIEF VALUES (ICI03.TXT) and CASE CONCLUSION (ICI10.TXT). As before, a single case may result in: no case conclusion (*e.g.*, where a case is withdrawn or combined with another), a single (the most common occurrence), or multiple case conclusions. The field total Federal Penalty Assessed Amount (FED_PENALTY) is the sum of federal penalties at all <u>settlements</u> at a case, *i.e.*, if multiple settlements (case conclusions) exist at a case, any federal penalties at those case conclusions are summed and reported here.

Similarly, the fields State\Local Penalty Amount (ST_LCL_PENALTY), Total SEP (Supplemental Environmental Project) Amount (TOTAL_SEP), Total Complying Action Amount (TOTAL_INJ_RELIEF), and Federal Cost Recovery Awarded Amount (FED_COST_REC) represent the sum of those reported values for all settlements (case conclusions) at a case. State/Local penalties were not tracked until Docket was replaced by ICIS in 2002. The cost of completing a SEP and the cost of complying actions are estimates and are not fines paid to EPA but rather are costs incurred to resolve the violations and/or in lieu of paying a fine. Cost recovery amounts are generally the costs incurred by EPA to stabilize and/or clean up Superfund sites, which are then recovered from the individuals or entities associated with the site (commonly referred to as potentially responsible parties or PRPs).

2. ICIS FE&C Data Download File Structure

Fourteen pipe (|) delimited text files comprise the data download. Data were selected based on a single criterion: that the ICIS Activity Type (ACTTYPC) is equal to "administrative – formal" or "judicial." The files contain repeating data fields, which will cause records to repeat the key field(s), *e.g.* ACTVID, where a case has multiple values of the repeating field(s). Also included are additional 14 delimited text files providing descriptions for data element code values.

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	LAWSECD	Char	15	Y	LAW_SECTION_CODE

Element Name	Data Type	Length	Repeating Data	Description
		FA	CILITIES IN O	CASE (ICI06.TXT 157,546 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
FCLTUIN	Char	12	Y	FACILITY_UIN
FCLTYNM	Char	200	Y	PRIMARY_NAME
FCLTYAD	Char	50	Y	LOCATION_ADDRESS
FCLTCIT	Char	50	Y	CITY_NAME
FCLTSTC	Char	2	Y	STATE_CODE
FCLTPST	Char	10	Y	ZIP CODE (NNNNN-NNNN)
FCLPSIC	Char	4	Y	PRIMARY_SIC_CODE
FPNAICS	Char	6	Y	PRIMARY_NAICS_CODE
			DEFENDAN	TS (ICI07.TXT 171,497 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
DEFENNM	Char	50	Y	DEFENDANT_NAME
DEFENNC	Char	1	Y	NAMED_IN_COMPLAINT_FLAG
DEFENNS	Char	1	Y	NAMED_IN_SETTLEMENT_FLAG
		MILESTO	ONE ACTIVITI	IES/DATES (ICI08.TXT 526,861 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
SUBACTY	Char	5	Y	SUB_ACTIVITY_TYPE_CODE
SUBACTY_DESC	Char			SUB_ACTIVITY_TYPE_CODE DESCRIPTION
SUBACAD	Num	8	Y	ACTUAL_DATE (YYYYMMDD)
		РС	LLUTANTS C	ITED (ICI09.TXT 80,034 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
POLLUCD	Char	22	Y	POLLUTANT_CODE
POLLUCD_DESC	Char			POLLUTANT_CODE DESCRIPTION
POLLUAB	Char	50	Y	CHEMICAL_ABSTRACT_SERVICE_NMBR
	1	C	ASE CONCLUS	SION (ICI10.TXT 127,743 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
ENFCID	Num	10		ENF_CONCLUSION_ID – Key Field
ENFORNU	Num	8	Y	ENF_CONCLUSION_NMBR
ENFCOAC	Char	3	Y	ENF_CONCLUSION_ACTION_CODE
ENFCONM	Char	50	Y	ENF_CONCLUSION_NAME
ENFCSLD	Num	8	Y	SETTLEMENT_LODGED_DATE
ENFCSED	Num	8	Y	SETTLEMENT_ENTERED_DATE
ENFCFPA	Num	9	Y	FED_PENALTY_ASSESSED_AMT
ENFCSLP	Num	9	Y	STATE_LOCAL_PENALTY_AMT
ENFCTSA	Num	9	Y	TOTAL_SEP_AMT
ENFCCAA	Num	9	Y	TOTAL_COMP_ACTION_AMT
ENFCRAA	Num	9	Y	COST_RECOVERY_AWARDED_AMT
		POLL	UTANT REDU	JCTIONS (ICI11.TXT 44,378 Records)
ACTVID	Num	15		ACTIVITY_ID – Key Field
ENFCID	Num	10	Y	ENF_CONCLUSION_ID – Key Field
ENVIMPC	Char	22	Y	POLLUTANT_CODE
ENVIMPC_DESC	Char		Y	POLLUTANT_CODE DESCRIPTION

Element Name	Data Type	Length	Repeating Data	Description	
ENVIAAV	Num	4	Y	AVERAGE_ANNUAL_VALUE	
ENVIMPU	Char	7	Y	POLLUTANT_UNIT_CODE	
ENVIMME	Char	3	Y	MEDIA_CODE	
ENVIMME_DESC	Char		Y	MEDIA_CODE DESCRIPTION	
ENVISCF	Char	1	Y	SEP_OR_COMP_FLAG	
		CON	MPLYING ACT	TIONS (ICI12.TXT 148,062 Records)	
ACTVID	Num	15		ACTIVITY_ID – Key Field	
ENFCID	Num	10	Y	ENF_CONCLUSION_ID – Key Field	
COMPATY	Char	3	Y	COMP_ACTION_TYPE_CODE	
COMPATY_DESC	Char		Y	COMP_ACTION_TYPE_CODE DESCRIPTION	
COMPACT	Char	3	Y	COMP_ACTION_CATEGORY_TYPE_CODE	
COMPALN	Num	4	Y	LINE_NUMBER FOR COMPATX	
COMPATX	Char	60	Y	COMP_ACTION_TEXT	
	EN	FORCEME	NT CONCLUS	ION FACILITIES (ICI13.TXT 142,545 Records)	
ACTVID	Num	15		ACTIVITY_ID – Key Field	
ENFCID	Num	10	Y	ENF_CONCLUSION_ID – Key Field	
SFLTUIN	Char	12	Y	SETTLING FACILITY UIN	
SFLTYNM	Char	80	Y	SETTLING FACILITY NAME	
SFLTCIT	Char	60	Y	SETTLING FACILITY CITY	
SFLTSTC	Char	2	Y	SETTLING FACILITY STATE	
	SEP DESCRIPTION (ICI14.TXT 14,651 Records)				
ACTVID	Num	15		ACTIVITY_ID – Key Field	
ENFCID	Num	10	Y	ENF_CONCLUSION_ID – Key Field	
SEPCTGR	Char	3	Y	SEP_CATEGORY_CODE	
SEPCTGR_DESC	Char		Y	SEP_CATEGORY_CODE DESCRIPTION	
SEPTXLN	Num	2	Y	SEP TEXT LINE NUMBER	
SEPTXTX	Num	2	Y	SEP TEXT	

3. Data Element Definitions

The following is a list of the data elements and ICIS-derived elements that appear in the IDEA–ICIS download. The data elements are listed alphabetically.

ACTMMFL (Multi-media Flag) - The flag to indicate whether the activity was a multimedia action. Multimedia actions involve violations of multiple environmental laws

ACTSEPA (Activity Lead) A one character field indicating whether federal EPA (E) or a state agency (S) has the lead for the enforcement activity.

ACTSTTC (Activity Status Code) - The unique code that identifies the current status of an activity. Valid values are provided in a lookup file.

ACTTYPC (Activity Type Code) - A three-character code that identifies the type of ICIS activity, which includes general categories such as information requests, inspections, compliance determinations, and enforcement. Activities selected for the ECHO data download are restricted to two subcategories of enforcement: administrative – formal (AFR), and judicial activities (JDC).

ACTVID (Activity Identifier) - an internal numeric key identifier used to uniquely identify enforcement case activities.

COMPACT (Compliance Action Category Type Code) A code that uniquely identifies the category of complying action affiliated with the quantitative environmental impact.

COMPACT Value	COMPACT Description		
DIR	Direct Environmental Reduction		
PRV	Preventative		
FSM	Facility/Site Management or Information Practice		
RAR	Removal and Restoration		
ROR	Reduction of Ongoing Releases		
PFR	Prevention of Future Releases		
WPR	Work Practices		
DIM	Direct Environmental Reduction		
PRM	Preventative		
FMM	Facility/Site Management or Information Practice		

COMPATX (Compliance Action Text) - Text description of enforceable requirement that the defendant/respondent is obliged to take or refrain from certain, specified actions.

COMPATY (Compliance Action Type Code) - The unique code that identifies the physical and non-physical requirements obliging the defendant/respondent to take or refrain from certain actions. Valid values are provided in the field COMPATY_DESC.

COMPALN (Compliance Action Text Line Number) - Derived value for line number of text description of enforceable requirement that the defendant/respondent is obliged to take or refrain from certain, specified actions.

DEFENNC (Named in Complaint Flag) – A one character field indicating whether a defendant has been named in the case complaint. Valid value is "Y."

DEFENNM (Defendant Name)- A 50 character field that contains the name(s) of the defendant(s), PRPs (for Superfund cases), or respondents associated with the case.

DEFENNS (Defendant Named in Settlement Flag) - A one character field indicating whether a defendant has been named in a settlement at the case. Valid value is "Y."

ENFCCAA (Total Compliance Action Amount) - Dollar value of sum of compliance action amounts (derived value from IDEA). This field is the settlement-level sum of the dollar values of injunctive relief and the physical or nonphysical costs of returning to compliance. Injunctive relief represents the actions a regulated entity is ordered to undertake to achieve and maintain compliance, such as installing a new pollution control device to reduce air pollution, or preventing emissions of a pollutant in the first place.

ENFCFPA (Federal Penalty Assessed Amount) - For civil judicial enforcement actions, this amount is the Federal penalty assessed against the defendant(s) as specified in the final entered Consent Decree or Court Order. For administrative enforcement actions, it is the penalty assessed in the Consent/Final Order. It does not include the amount of the penalty mitigated due to a SEP or the amount shared with the state or local entities. Interest payments associated with a penalty paid over time are not to be included in this amount. It is the total Federal amount for each settlement.

ENFCID (Enforcement Conclusion ID) - The unique identifier for each settlement within a case.

ENFCOAC (Enforcement Conclusion Action Code) - The unique code that identifies the type of enforcement conclusion actions. Valid values are provided in a lookup file.

ENFCONM (Enforcement Conclusion Name) - The unique name of a settlement associated with an enforcement action.

ENFCRAA (Cost Recovery Awarded Amount) -The amount of cost recovery ordered or agreed to be repaid by the responsible party of parties and due the Superfund in accordance with either an administrative or judicial settlement.

ENFCSED (Settlement Entered Date) - The civil case date the settlement is signed by the presiding Judge and entered by the Clerk of the Court. It is the date the Clerk stamps on the document. Date format is YYYYMMDD.

ENFCSLD (Settlement Lodged Date) - The date the settlement document is given to the Clerk of the Court for lodging in the District Court. It is the date the Clerk stamps on the document. Date format is YYYYMMDD.

ENFCSLP (State\Local Penalty Amount) - The penalty amount for local government or state settlements, or the amount allocated to a state/local entity from a federal enforcement settlement with state\local participation.

ENFOBRN (EPA Branch) - The EPA Branch or unit office responsible for the enforcement action.

ENFOCNU (Case Number) - An up to 20 character alphanumeric value, used to uniquely identify an enforcement activity (*a.k.a.* enforcement case). Federal EPA ENFOCNU values typically begin with either two characters (EPA region number, "HQ" (headquarters), "EF" (CAA Eastern Field Office), or "WF" (CAA Western Field Office), followed by the four digit fiscal year in which the action was initiated, followed by a four character sequence identifier. State ENFOCNU values do not follow any set format.

ENFOHQD (EPA Headquarters Division) - The EPA Headquarters division responsible for the enforcement action.

HQD Code	Description
AIR	Air Enforcement
CER	CERCLA Enforcement
FFE	Federal Facilities Enforcement
MED	Multimedia Enforcement
MOB	Air Mobile Source Enforcement
RCR	RCRA Enforcement
TOX	TSCA Enforcement
WAT	CWA Enforcement

ENFOLN (Enforcement Summary Line Number) - A derived sequential line number used to group multiple summary lines (ENFOSUM).

ENFOOUT (Enforcement Outcome Code) - The unique code to identify the outcome of the enforcement action. Valid values are provided in a lookup file.

ENFORCD (Court Docket Number) - A 50 character field that contains the number that the Clerk of the Court assigns to a case when it is filed or to a consent decree when it is lodged. For administrative cases, ENFORCD is the number assigned to the case by the Regional Hearing Clerk.

ENFORNM (Enforcement Name) - An alphanumeric field (up to 100 characters) that contains the name assigned to the case by the lead attorney. Generally, the primary defendant's name is used as the case name.

ENFORNU (Enforcement Conclusion Number) - A unique number used as the key field, identifying the enforcement case conclusion (*a.k.a.* settlement number).

ENFOSUM (Enforcement Summary Text) – A 60 character field of text representing a summary of the enforcement activity/case. Multiple ENFOSUM lines for the same case are grouped using ENFOLN.

ENFOVSD (Voluntary Self Disclosure Flag) - The flag to indicate the enforcement action was the result of a self disclosure.

ENFRLF (Relief Code)- The code to indicate the type of relief requested in the complaint. Valid values are provided in a lookup file.

ENFTYPE (Case Type) - A seven-character field that indicates the enforcement case type. For administrative cases, the Type Case is the section of the statute authorizing the action. For administrative cases, more than one administrative Type Case can be entered. Each Type Case entered must have a matching Law entered. For civil cases, only one Type Case is accepted.

Valid values are provided in a lookup file.

ENVIAAV (Average Annual Value) - Average annual amount of pollutant reduction as a result of the enforcement action.

ENVIMME (Media Code) - The unique code identifying a type of media (air, water, land, etc.) where the pollutants or waste would have been emitted/discharged. Value descriptions are provided by the field **ENVIMME_DESC**.

ENVIMPC (Pollutant Code) - The unique identifier for the pollutant/parameter being reduced. Value descriptions are provided by the field **ENVIMPC_DESC**.

ENVIMPU (Pollutant Unit Code) - The unique code to identify the pollutant unit of measurement. Valid values are provided in a lookup file.

ENVISCF (SEP or Comp Flag) - The flag to indicate if the qualitative environmental impacts pertain to a Supplemental Environmental Project (SEP) or compliance action.

FCLPSIC (Facility Primary SIC Code) - a four character field containing the 4-digit Standard Industrial Classification (SIC) codes representing the primary economic activity of the facility, as reported in the ICIS facility record.

FCLTCIT (Facility City) - A 50 character field that contains the name of the city in which the facility where the violation(s) occurred is located. For violations that occur outside of a facility (*e.g.*, oil spills, pipeline leaks), the city may be the mailing address of the violator.

FCLTPST (Facility Zip Code) - A 9 character field that contains the U.S. Postal Zone Improvement Plan (ZIP) code for the area in which the facility where the violation(s) occurred is located. For violations that occur outside of a facility (*e.g.*, oil spills, pipeline leaks), the Zip code may be the one associated with the mailing address of the violator.

FCLTSTC (Facility State) - A two-character field that contains the state postal abbreviation for the state in which the facility where the violation(s) occurred is located. For violations that occur outside of a facility (*e.g.*, oil spills, pipeline leaks), the state may be the mailing address of the violator.

FCLTUIN (Facility UIN) - The number assigned by the Facility Registry System (FRS) that is used to associate facility records from multiple environmental database systems that were known or believed to represent the same facility (*a.k.a.* EPA ID Number).

FCLTYAD (Facility Address) - A 50 character field that contains the street address of the facility. It is the physical location of the facility where the violation(s) occurred. For violations that occur outside of a facility (*e.g.*, oil spills, pipeline leaks), the address may be the mailing address of the violator.

FCLTYNM (Primary Facility Name) -A 200 character field that contains the name of the facility associated with the EPA Identification Number.

FED_COST_REC (Federal Cost Recovery Awarded Amount) -The amount of cost recovery ordered or agreed to be repaid to the U.S. EPA by the responsible party or parties and due the Superfund in accordance with either an administrative or judicial settlement. This value is the derived sum of all settlements at a case.

FED_PENALTY (Total Federal Penalty Assessed Amount)- The total federal penalty amount assessed or agreed to for an enforcement action. This value is the derived sum of federal penalties at all settlements at a case.

FPNAICS (Facility Primary NAICS Code) – a six character field containing the 6-digit North American Industry Classification System codes that represents representing the primary economic activity of the facility, as reported in the ICIS facility record.

LAWSECD (Law Section Code) - A 15 character code that indicates the section of the law violated by the defendant(s) and cited in the action. For each entry in the Law field (LAWS) there is a corresponding entry in the Section field. There is an entry for each distinct violation or activity, (e.g., CERCLA cost recovery) identified in the complaint. Valid values are provided in a lookup file.

LAWSERO (Law Section Rank Order) – A one digit code indicating the sort order for the law section on the Case (activity). Those LAWSESC- LAWSECD combinations identified with LAWSERO = 1 are considered the primary statute and section cited in the case.

LAWSESC (Statute Code)- The unique code that identifies the law which is authorizing the enforcement action or being violated. (The list of possible laws is presented in the table below.)

LAWSESC	LAWSESC Description			
CAA	Clean Air Act			
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act			
CWA	Clean Water Act			
EPCRA	Emergency Planning & Community Right-To-Know Act			
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act			
MPRSA	Marine Protection, Research and Sanctuaries Act (Ocean Dumping Act)			
MWTA	Medical Waste Tracking Act			
RCRA	Resource Conservation and Recovery Act			
SDWA	Safe Drinking Water Act			
TSCA	Toxic Substances Control Act			
MCRBMA	Mercury-Containing And Rechargeable Battery Management Act			
MRBMA	Mercury-Containing And Rechargeable Battery Management Act (MRBMA)			
REFA	Refuse Act			
EO	Executive Order			
OPA	Oil Pollution Act			

POLLUAB (Pollutant Chemical Abstract Service Number) - of the pollutant/parameter violated.

POLLUCD (Pollutant Code) - The unique identifier for the pollutant/parameter violated. Value descriptions are provided by the field **POLLUCD_DESC**.

SEPCTGR (Supplemental Environmental Project (SEP) Category Code) - The unique code that identifies the list of Supplemental Environment Project (SEP) categories for a settlement. Value descriptions are provided by the field **SEPCTGR_DESC**.

SEPTXLN (Supplemental Environmental Project (SEP) Text Line Number) – An up to four character derived line number to group multiple values of SEP descriptive text (SEPTXTX).

SEPTXTX (Supplemental Environmental Project (SEP) Text) - A 60 character field of text representing a summary of the Supplemental Environmental Project at a settlement. Multiple SEPTXTX lines for the same SEP are grouped using SEPTXLN.

SFLTCIT (Settling Facility City) - The name of the city in which the settling facility is located.

SFLTSTC (Settling Facility State) - A two-character field that contains the state postal abbreviation of the settling facility's location.

SFLTYNM (Settling Facility Name) -An 80 character field that contains the name of the facility associated with the settlement.

SFLTUIN (Settling Facility UIN) - The number assigned by the Facility Registry System (FRS) that is used to associate facility records from multiple environmental database systems that were known or believed to represent the same facility.

ST_LCL_COST_REC (State/Local Cost Recovery Awarded Amount) -The amount of cost recovery ordered or agreed to be repaid by the responsible party or parties to a state/local entity from a federal enforcement settlement with state\local participation. This value is the derived sum of all settlements at a case.

ST_LCL_PENALTY (State\Local Penalty Amount) - The total penalty amount for local government or state settlements, or the amount allocated to a state/local entity from a federal enforcement settlement with state\local participation. This value is the derived sum of all settlements at a case.

SUBACAD (SubActivity Actual Date) - The date on which the sub activity/milestone was conducted/ achieved. Date format is YYYYMMDD.

SUBACTY (SubActivity Type Code) - The code used to identify the types of sub-activities and enforcement action milestones. The code descriptions, rather than the codes, are provided in the data file. Value descriptions are provided by the field **SUBACTY_DESC**.

TOTAL_INJ_RELIEF (Total Injunctive Relief Amount) - Dollar value of sum of compliance action amounts. This field is the case-level sum of the dollar values of injunctive relief and the physical or nonphysical costs of returning to compliance.

TOTAL_SEP (Total SEP Amount) - The total cost for all Supplemental Environmental Projects (SEPs) entered for the case. The SEP cost is the estimated cost of environmentally beneficial

projects which a defendant/ respondent agrees to undertake as part of the settlement of an enforcement action, but which the defendant/respondent is not otherwise legally required to perform.