Significant Non-Compliance
SNC

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NC

RNC

SNC
Why is SNC Important?

Allows targeting of limited enforcement resources to those violations posing the greatest risk to health and the environment.
What is SNC?

- It’s all about the violations!
- Reporting
- Effluent limitations
- Schedules
- Bypass
- Pass through
- Unpermitted discharge
Majority of DNR’s SNC Violations?

💧 60% of Missouri’s SNC Violations are related to reporting
💧 Non-receipt, late and incomplete reports
How does EPA Determine SNC?

💧 Identifies violations based on data, compared to permit requirements in ICIS
💧 Evaluates whether required data was received on time
💧 Recognizes formal enforcement actions
EPA SNC Data

Enforcement and Compliance History Online (ECHO)
ECHO

💧 Data available in ECHO 2.5 months after the end of the quarter
💧 Each state is responsible for quality assurance on its data
💧 Critical for batch submission states like Missouri
ECHO Challenges

💧 If we have data errors, and late submissions they must be entered by hand in order to be counted accurately.

💧 Data errors corrected by batch take too long to re-run in ECHO, unlikely to be corrected before report is posted.
EPA National Compliance Initiative (NCI)

- June 7, 2019 CWA NPDES SNC NCI
- 50% reduction NPDES SNC rate
- Reduce rate from 29.4% to 14.7% by end of FFY 2022
Wastewater Systems in Compliance with Effluent Limitations

- FY 2017: 87.90%
- FY 2018: 87.00%
- FY 2019: 86.17%
Wastewater Systems in Compliance with Reporting Requirements

FY 2017: 93.78%
FY 2018: 83.68%
FY 2019: 71.20%
Compliance Rate

DNR Reporting (All Reports) 64%

DNR Exceedances 88%

DNR Oct. 1, 2018 – Oct. 1, 2019, ECHO FFYQ4
How can DNR Help Facilities Get and Stay out of SNC?

- Avoid SNC
- Prompt return to compliance
- Timely formal enforcement
What is DNR Doing?

- Data
- Targeting RNC
- Monitor progress monthly
Tools

- Compliance Assistance
  - Region staff
  - Record Review letters
  - Reminders

- Formal enforcement
  - Abatement Orders etc.
  - Litigation through AGO
Tools continued

- Data Changes
- Corrections
- Additional Coding
Missing DMR Data
October to January 2020

- 1591 missing or late DMRs
- 1643 auto-dialer calls
- 999 calls answered
- 419 DMRs submitted
- Missing or late DMRs reduced by 26%
Questions?